

## **4.5 Cultural/Historical Resources**

RECON conducted a cultural resource survey of the Archstone – Mission Gorge project site in January 2008. The survey consisted of a review of all relevant site records and reports on file, as well as an intensive on-foot survey of the project site. The cultural resources technical report is summarized below and included as Appendix H of this EIR.

### **4.5.1 Existing Conditions**

#### **4.5.1.1 Known Prehistoric/Historic Resources**

##### **a. Cultural Setting**

The prehistoric cultural sequence in San Diego County is generally composed of three basic periods: the Paleoindian dating between about 11,500 and 8,500 years ago; the Archaic, lasting from about 8,500 to 1,500 years ago (A.D. 500); and the Late Prehistoric, lasting from about 1,500 years ago to historic contact (i.e., A.D. 500 to 1769).

The Paleoindian period in San Diego County is manifested by the artifacts of the San Dieguito Complex which consists of well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped points. The San Dieguito Complex is thought to represent an early emphasis on hunting.

The Archaic period is manifested by the cobble and core technology of the La Jollan Complex, and reflects a shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. Along with an economic focus on gathering plant resources, the settlement system appears to have been fairly sedentary. The La Jollan Complex is dominated by rough, cobble-based choppers and scrapers, and slab and basin metates. Large deposits of marine shell at coastal sites suggest the importance of shellfish gathering to the coastal Archaic economy.

The Late Prehistoric period in San Diego County is represented by the Cuyamaca Complex and patterns that suggest the emergence of the ethnohistoric Kumeyaay. This period is marked by the appearance of ceramics, small arrow points, and cremation burial practices, as well as by higher population densities and elaborations in social, political, and technological systems. Economic systems diversify and intensify during this period, with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive, but effective technological innovations.

The Kumeyaay occupied the southern two-thirds of San Diego County and lived in semi-sedentary, politically autonomous villages or rancherias. The most basic social and economic unit was the patrilocal extended family. Their economic system consisted of

hunting and gathering, with a focus on small game, acorns, grass seeds, and other plant resources. A wide range of tools was made of locally available and imported materials such as obsidian. Ground stone objects of the Kumeyaay included mortars and pestles typically made of locally available, fine-grained granite. The Kumeyaay also made fine baskets that employed either coiled or twined construction. The Kumeyaay also made pottery. Most were a plain brown utility ware called Tizon Brownware, but some were decorated.

A period of historic contact began in San Diego County in the mid-1700s, beginning with the Spanish (1769-1821), followed by the Mexican (1822-1848) and American (starting mid-1800s) homestead systems. One of the hallmarks of the Spanish colonial period was the rancho system. In an attempt to encourage settlement and development of the colonies, large land grants were made by the Spanish to meritorious or well-connected individuals.

During the Mexican colonial period, the mission system was secularized by the Mexican government and these lands allowed for the dramatic expansion of the rancho system. The local economy became increasingly based on cattle ranching. The Mexican period ended when Mexico signed the Treaty of Guadalupe Hidalgo in 1848, concluding the Mexican-American War. The great influx of Americans and Europeans resulting from the California Gold Rush in 1848-49 eliminated many remaining vestiges of Native American culture.

#### **b. Records Search**

Record searches conducted at the South Coast Information Center (SCIC), San Diego Museum of Man (SDMM) and Native American Heritage Commission (NAHC) indicate that no previously recorded prehistoric or historic cultural resources or sacred sites are present on the project site. However, nine cultural resource sites are recorded within one mile of the project site. Six of the recorded sites are prehistoric: CA-SDI-11,613 (SDM-W-4420), -11,723 (-W-4439), -12,088 (-W-4668), -12,089, -14015 (-W-6488), and -14016 (-W-6489). Three of the recorded sites are historic: CA-SDI-35 (-W-956), SDM-W-4444, and CA-SDI-11,720H (-W-4337). One of the recorded prehistoric sites, CA-SDI-14015, was subsequently determined to be redeposited marine shell and not a cultural resources site. A second recorded prehistoric site, CA-SDI-14016, is also probably redeposited marine shell.

The Mission San Diego de Alcalá and the site of the ethnographic Kumeyaay village of Nipaguay (CA-SDI-35) are well known important historical resources located within one mile of the project site, on the west side of the San Diego River. Associated with this site is the old Mission Dam and flume. The recorded site closest to the project site is the historic CA-SDI-11720H (-W-4337) site, which consists of over 200 bottle glass fragments, ceramics, metal fragments, and construction debris. It is approximately 790 feet (or 240 meters) to the north of the project site.

### **c. Field Inspection**

The project area was surveyed on foot in conditions of good weather and natural daylight by a qualified RECON archaeologist and a Native American Observer on January 14, 2008. Very little ground surface was visible during the survey because of the presence of on-site mobile homes and landscaping. What soil was visible did not appear to be original ground surface but instead appeared to be imported topsoil or soil heavily augmented by soil amendments as it was dark, had very few rocks, and did not appear to be alluvium.

The field inspection of the project site uncovered no evidence of prehistoric or historic cultural material. The landform of the entire project site has been heavily altered by grading and cutting to form two large pads for the mobile home lots. The upper pad probably corresponds in elevation to an upper river terrace of the San Diego River, while the lower terrace is within the current river floodplain. The slope separating the two pads is probably an original natural slope that has since been modified by fill being pushed onto it from the flattening of the upper terrace. Any surface prehistoric or historic cultural resources once present on the property have likely been destroyed by grading for the mobile home park.

## **4.5.2 Significance Determination Thresholds**

Cultural resources significance determination, pursuant to the City of San Diego's 2007 Significance Determination Thresholds, consists first of determining the significance of identified cultural resources and, secondly, determining direct and indirect impacts that would result from project implementation.

### **4.5.2.1 Evaluation of Cultural Resource Significance**

Federal, state, and local criteria are used to evaluate the significance of a prehistoric or historic resource.

- Federal criteria are those used to determine eligibility for the National Register of Historic Places (NRHP). These criteria state that the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association, and:
  - A. are associated with events that have made a significant contribution to the broad patterns of our history; or
  - B. are associated with the lives of persons significant in our past; or

- C. embody the distinctive characteristics of a type, period, or method of construction; or that represent the work of a master; or that possess high artistic values; or that
  - D. have yielded, or may be likely to yield information important in prehistory or history.
- State criteria are those listed in CEQA and used to determine whether a historic resource qualifies for the California Register of Historic Resources (CRHR). According to the CEQA Guidelines Section 15064.5 and Appendix G, adoption and implementation of the proposed project would result in a significant adverse cultural resources impact if the proposed project would:
    - A. Cause a substantial adverse change in the significance of a historical architectural resource that is listed on, or determined to be eligible for listing on, the National Register of Historic Places or the California Register of Historic Resources; is listed on or determined to be eligible for listing on the San Diego List of Historic Sites; or that meets any of the following criteria:
      - Is associated with events that have made a significant contribution to the broad patterns of history at the local, regional, state, or national level;
      - Is associated with the lives of significant persons in the past on a local, regional, state or national level;
      - Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values; or
      - Has yielded, or may be likely to yield, information important in history or prehistory; or
    - B. Cause a substantial adverse change in the significance of an important archaeological resource or disturb any human remains, including those interred outside of formal cemeteries.
  - City of San Diego criteria include all properties (historic, archaeological, landscapes, traditional, etc.) that are eligible or potentially eligible for the NRHP; those properties that may be significant under state and local laws and registration programs, such as the CRHR and the City of San Diego Historical Resources Register. Any improvement, building, structure, sign, interior element and fixture, site, place, district, area or object may be designated as historic by the City of San Diego Historical Resources Board if it meets any of the following criteria:

- A. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
  - B. Is identified with persons or events significant in local, state, or national history;
  - C. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
  - D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
  - E. Is listed on or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the California OHP for listing on the State Register of Historical Resources; or
  - F. Is a finite group of resources related to one another in a clearly distinguishable way; or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the city.
- If a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register, or not deemed significant in a historical resource survey, City criteria states that it may nonetheless be historically significant. The significance of a historical resource in this case would be based on the potential for the resource to meet one or more of the criteria presented above, including the potential to address important research questions as documented in a site specific technical report.

As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA.

- An archaeological site must consist of at least three associated artifacts/ecofacts (within a 40-square-meter area) or a single feature. Archaeological sites containing only a surface component are generally considered not significant, unless otherwise demonstrated. (Testing is required to document the absence of subsurface deposit. The determination of significance is based on a number of factors specific to a particular site, including site size, type, and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage

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complexity; cultural affiliation; association with an important person or event; and ethnic importance.

#### **4.5.2.2 Determination of Impact Significance**

The City's Initial Study Checklist questions contained in the 2007 Significance Determination Thresholds provide guidance in determining the significance of project impacts to cultural resources. Impacts to cultural resources would be significant if the proposed project would result in:

- An alteration, including the adverse physical or aesthetic effects, and/or the destruction of, a prehistoric or historic archaeological site, object, or structure;
- Any impact to existing religious or sacred uses within the potential impact area; or
- Disturbance of any human remains, including those interred outside of formal cemeteries.

#### **4.5.3 Issue 1: Prehistoric/Historic Resources**

Would the proposed project result in the alteration and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site?

##### **4.5.3.1 Impacts**

Proposed development plans indicate the entire property would be impacted by the construction of the proposed project. Because of this, the area of potential effect (or APE) is considered to be the entire project property, with demolition and construction grading anticipated to impact the entire project site.

A records search and field survey identified no prehistoric or historic cultural material on the project site. The project site has been heavily impacted by previous grading and terracing of the natural landform to accommodate the mobile home park built in 1959. Any surface prehistoric/historic cultural resources once present on the project site has likely been destroyed by the existing mobile home development. Because of the extent of previous ground disturbance, the potential for intact subsurface cultural deposits on the eastern half of the project site is remote.

While the natural landform of the western half of the project site has also been heavily disturbed by grading for the existing mobile home park, it remains in a more natural state than the eastern half of the project site. Due to the location of the project site within the San Diego River valley where known prehistoric and historic resources exist, there is a

potential for subsurface cultural resources to exist in the western portion of the project site which is within the floodplain of the San Diego River. Sensitive cultural resources could be uncovered during project grading, resulting in a significant loss of cultural resources.

#### **4.5.3.2 Significance of Impacts**

Given the location of the project site in an area rich in cultural resources, the potential loss of subsurface cultural resources would be a significant impact.

#### **4.5.3.3 Mitigation, Monitoring, and Reporting**

Because of the possibility of existence of subsurface cultural resources, a qualified archaeological monitor and a Native American monitor shall be present during construction in the western portion of the project site.

##### ***Mitigation Measure***

The area of monitoring shall extend from the western boundary of the project site 300 feet to the east at the southern edge and widen to 600 feet at the northern edge (Figure 4.5-1). The eastern edge of the proposed monitoring area corresponds to the current obvious elevation change.

##### **I. Prior to Permit Issuance**

###### **A. Entitlements Plan Check**



1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the appropriate construction documents.

###### **B. Letters of Qualification have been submitted to ADD**

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.



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-  Project Boundary
-  Recommended Archaeological Monitoring Location

**FIGURE 4.5-1**  
Area Recommended for  
Archaeological Monitoring

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2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the monitoring program.

## **II. Prior to Start of Construction**

### **A. Verification of Records Search**

1. The PI shall provide verification to MMC that a site specific records search (¼ mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

### **B. PI Shall Attend Precon Meetings**

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
  - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
2. Identify Areas to be Monitored
  - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
  - b. The AME shall be based on the results of a site specific records search

as well as information regarding existing known soil conditions (native or formation).

### 3. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

## III. During Construction

### A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Native American monitor shall determine the extent of their presence during construction related activities based on the AME and provide that information to the PI and MMC. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.**
2. The monitor shall document field activity via the Consultant Site Visit Record (CSVr). The CSVrs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present.

### B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

**C. Determination of Significance**

1. The PI and Native American monitor shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
  - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
  - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
  - c. If resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

**IV. Discovery of Human Remains**

If human remains are discovered, work shall halt in that area and the following procedures as set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

**A. Notification**

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS).
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

## B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
3. *If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.*

C. If Human Remains **ARE** determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with the California Public Resource and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the *human remains and associated grave goods*.
5. Disposition of Native American Human Remains shall be determined between the MLD and the PI, IF:
  - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;
  - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.
  - c. In order to protect these sites, the Landowner shall do one or more of the following:

- (1) Record the site with the NAHC;
- (2) Record an open space or conservation easement on the site;
- (3) Record a document with the County.

d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are **NOT** Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner and the Museum of Man.

V. **Night and/or Weekend Work**

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Precon meeting.
2. The following procedures shall be followed.

a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV - Discovery of Human Remains.

c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

- d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

## VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
  - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
  - b. Recording Sites with State of California Department of Parks and Recreation

The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any

significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final

Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

#### **4.5.3.4 Significance of Impacts After Mitigation**

Implementation of the mitigation measures outlined above would reduce impacts to a level that is less than significant.

### **4.5.4 Issue 2: Religious/Sacred Uses**

Would the proposed project result in any impact to existing religious or sacred uses within the potential impact area?

#### **4.5.4.1 Impacts**

There are no known religious or sacred uses on-site or within the immediate vicinity of the project site. Therefore, implementation of the proposed project would have no impacts to religious and sacred uses.

#### **4.5.4.2 Significance of Impacts**

Since there are no known religious or sacred uses within the project area, there would not be a significant impact to these resources.

#### **4.5.4.3 Mitigation, Monitoring, and Reporting**

No religious or sacred uses would be impacted by the proposed project; therefore, no mitigation is required.

### **4.5.5 Issue 3: Human Remains**

Would the proposed project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

#### **4.5.5.1 Impacts**

Implementation of the proposed project would not adversely affect any known human remains and there are no known burial sites or cemeteries within the vicinity of the project area. Therefore, it is not expected that human remains would be disturbed as a result of the proposed project and impacts would not be significant. In the unlikely event of the discovery of human remains during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Sec. 5097.98) and

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State Health and Safety Code (Sec. 7050.5) shall be undertaken, as required in Section 4.5.3.3, Mitigation Measure above.

#### **4.5.5.2 Significance of Impacts**

There are no known human remains on the project site; therefore, there would not be a significant impact to human remains.

#### **4.5.5.3 Mitigation, Monitoring, and Reporting**

No human remains would be disturbed by the project; therefore, no mitigation would be required.

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## 4.6 Noise

The following section is based upon the Noise Technical Report for the Archstone - Mission Gorge Project prepared by RECON in July, 2008 (Appendix I). This section evaluates potential impacts associated with project construction and future traffic noise on Mission Gorge Road.

### 4.6.1 Existing Conditions

#### 4.6.1.1 Existing Noise Standards

Noise standards in the City of San Diego are expressed in community noise equivalent level (CNEL), a 24-hour A-weighted average decibel level [dB(A)] that accounts for frequency correction and the subjective response of humans to noise by adding 5 dB and 10 dB to the evening and nighttime hours, respectively.

##### a. Construction Noise

Construction noise is regulated by the City's Municipal Code. Section 59.5.0404 of the Municipal Code, the City's Noise Abatement and Control Ordinance, states that:

- It shall be unlawful for any person, between the hours of 7:00 P.M. of any day and 7:00 A.M. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise. . . .
- . . . it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 A.M. to 7:00 P.M.

##### b. Exterior Noise

As stated in the Noise Element of the General Plan and City Noise Abatement and Control Ordinance, the City's exterior noise level standard for noise-sensitive areas, which include residential uses, is 65 dB(A) CNEL. This exterior noise standard applies to both single-family and multi-family residential units as well as mobile homes and transient housing. Parks, schools, libraries, hospitals, day care centers, and convalescent homes are also considered incompatible with exterior noise levels in excess of 65 dB(A) CNEL.

Exterior usable areas of the proposed project were considered to consist only of the recreation/pool area and courtyards that were included in the project open space calculation (refer to Figure 3-3). The proposed project includes open space areas that are in addition to the required exterior useable areas. These include landscaped courtyards and seating areas, as well as decks/balconies for individual units. Since these areas are not necessary to meet the open space requirements for the project, they are not subject to noise thresholds.

### **c. Interior Noise**

Noise-sensitive residential/habitable interior spaces have an interior standard of 45 dB(A) CNEL as stated in the City's Significance Determination Thresholds and the *California Noise Insulation Standards*. The City's 2007 Significance Determination Thresholds indicate that for multi-family development, exterior noise levels would be considered significant if future projected traffic would result in noise levels exceeding 65 dB(A) CNEL at exterior usable areas or interior noise levels exceeding 45 dB(A) CNEL.

The City of San Diego assumes that standard construction techniques will provide a 15 dB reduction of exterior noise levels to an interior receiver. Given this assumption, standard building construction could be assumed to result in interior noise levels of 45 dB(A) CNEL or less when exterior noise sources are 60 dB(A) CNEL or less. When exterior noise levels are greater than 60 dB(A) CNEL, consideration of specific non-standard building construction techniques is required.

### ***California Code of Regulations***

Interior noise levels for multi-family residences are also regulated by Title 24 of the California Code of Regulations, *California Noise Insulation Standards*. The City evaluates interior levels for multi-family units as part of the building permit process and compliance with Title 24 review.

For multi-family structures, the California Noise Insulation Standards (Title 24 of the California Code of Regulations) requires the following:

**1208A.8.2 Allowable interior noise levels.** Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level ( $L_{dn}$ ) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan. . . .

Worst-case noise levels, either existing or future, shall be used as the basis for determining compliance with this section. Future noise levels shall be predicted for a period of at least 10 years from the time of building permit application.

**1208A.8.4 Other noise sources.** Residential structures to be located where the  $L_{dn}$  or CNEL exceeds 60 dB shall require an acoustical analysis showing that the proposed design will limit exterior noise to the prescribed allowable interior level.

**1208A.8.5 Compliance.** . . . If interior allowable noise levels are met by requiring that windows be unopenable or closed, the design for the structure must also specify a ventilation or air-conditioning system to provide a habitable interior environment. The ventilation system must not compromise the dwelling unit or guest room noise reduction.

#### 4.6.1.2 Existing Ambient Noise

Ambient noise levels at the project site are primarily due to traffic on Mission Gorge Road. Mission Gorge Road is a six-lane road with a posted speed limit of 45 miles per hour (mph) adjacent to the project site and a posted speed limit of 55 mph just north of the project site.

Two ambient noise measurements were made at the project site adjacent to Mission Gorge Road. Figure 4.6-1 shows the locations of these measurements. Measurement 1 was located adjacent to Mission Gorge Road at the northeastern corner of the project site. Measurement 2 was located adjacent to Mission Gorge Road just south of the southern project boundary. Ambient noise at both locations was dominated by traffic on Mission Gorge Road. Noise levels were measured at each location for 15 minutes, and traffic on Mission Gorge Road was counted during each interval. The average measured noise levels were 76.1 dB(A)  $L_{eq}$  at Location 1 and 76.0 dB(A)  $L_{eq}$  at Location 2. The traffic counts are summarized in Table 4.6-1.

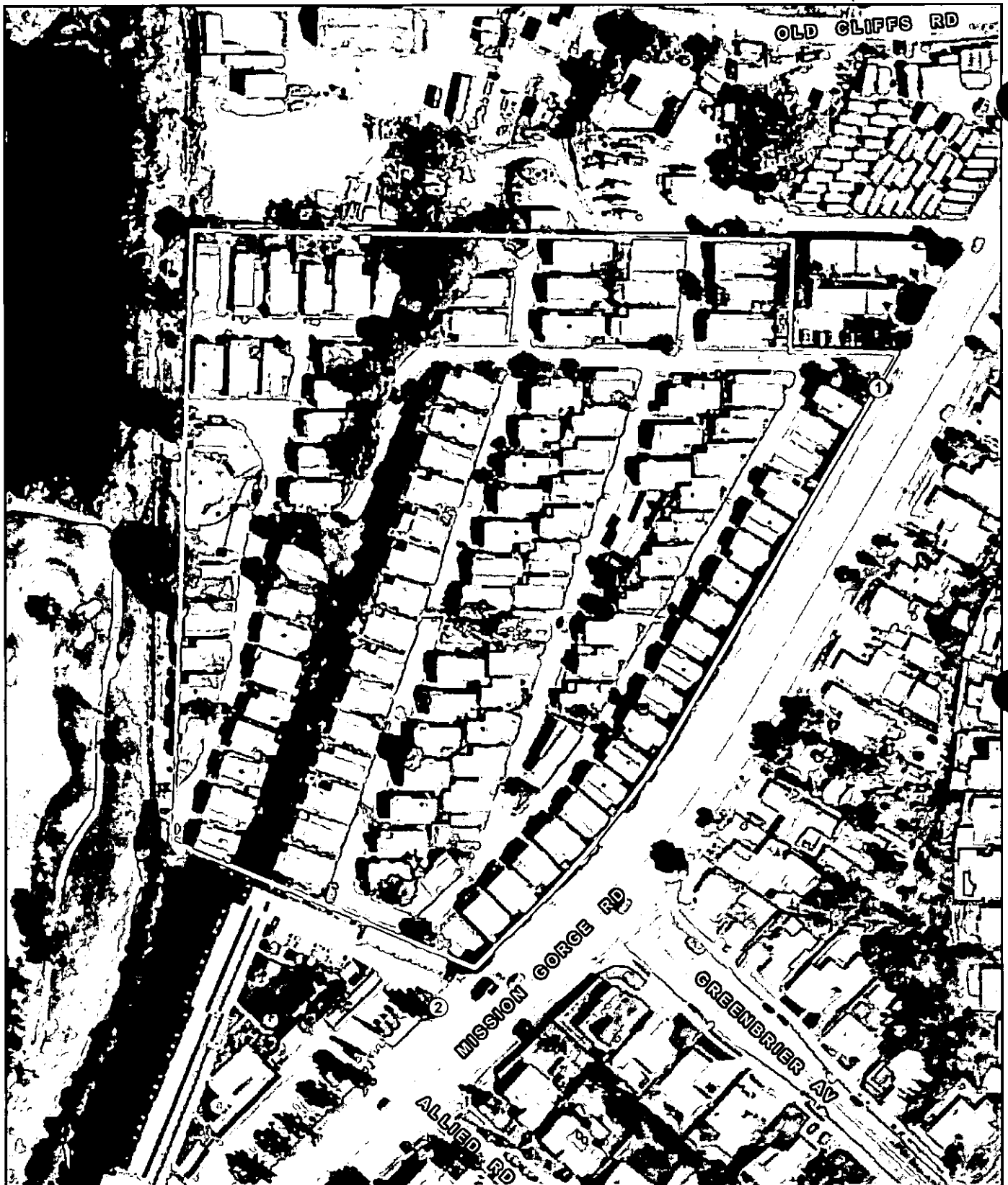
**TABLE 4.6-1  
15-MINUTE TRAFFIC COUNTS**

Measurement Location	Cars	Motorcycles	Medium Trucks	Buses	Heavy Trucks
Measurement 1					
NB Mission Gorge Road	236	0	7	6	6
SB Missions Gorge Road	200	0	8	1	4
Measurement 2					
NB Mission Gorge Road	243	0	7	1	5
SB Missions Gorge Road	188	1	8	2	5

NB = northbound; SB = southbound.

#### 4.6.2 Significance Determination Thresholds

According to the City of San Diego's January 2007 Significance Determination Thresholds, the following criteria are used to determine a potential threshold at which noise levels would be considered significant under CEQA:



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0 Feet 150



-  Project Boundary
-  Noise Measurement Locations

FIGURE 4.6-1

Noise Measurement Locations

000381

#### 4.6.2.1 Traffic Noise

- **Exterior noise** levels would be considered significant if projected traffic would result in noise levels exceeding 65 dB(A) CNEL at exterior usable areas for noise sensitive uses, including multi-family residences.
- **Interior noise** levels for multi-family residences, as regulated by Title 24 of the California Code of Regulations, would be considered significant if interior noise levels at multi-family residences would exceed 45 dB(A) CNEL.

#### 4.6.2.2 Construction Noise

- Pursuant to the City's Noise Ordinance, temporary construction noise which exceeds 75 dB(A)  $L_{eq}$  at a sensitive receptor would be considered significant.

### 4.6.3 Issue 1: Ambient Noise Level Increase

Would the proposed project result in a significant increase in the existing ambient noise level?

#### 4.6.3.1 Impacts

The proposed project would result in the construction of a 444-unit multi-family rental condominium complex located adjacent to Mission Gorge Road. As a residential land use, the project does not contain any features that would generate excessive noise. Thus, while the development of the site with residential uses would alter the existing ambient noise environment, the project would not create a significant increase that would violate the City's Noise Ordinance or the City's Significance Determination Thresholds. The project would generate traffic that would contribute to noise in the project area as addressed in Section 4.6.5, Issue 3: Traffic Noise.

#### 4.6.3.2 Significance of Impacts

Noise generated from the project would not cause significant noise impacts.

#### 4.6.3.3 Mitigation, Monitoring, and Reporting

Impacts would not be significant. No mitigation is required.

### 4.6.4 Issue 2: Construction Noise

Would project construction expose people to noise levels which exceed the City's noise ordinance?

### 4.6.4.1 Impacts

Noise associated with the earthwork, excavation, construction, and surface preparation for the proposed project would result in short-term impacts to adjacent residential properties. A variety of noise-generating equipment would be used during the construction phase of the project such as scrapers, dump trucks, backhoes, front-end loaders, jackhammers, and concrete mixers.

Table 4.6-2 indicates the types of construction equipment typically involved in residential construction projects. This type of equipment can individually generate noise levels that range between 78 and 91 dB(A) at 50 feet from the source, as listed in Table 4.6-2. Ground-clearing activities generally generate the greatest average construction noise levels, of between 83 to 84 dB(A)  $L_{eq}$  50 feet from the site of construction (Bolt, Beranek, and Newman, Inc. 1971). The values in Table 4.6-2 are based on empirical data on the number and types of equipment at a construction site and their average cycle of operation.

**TABLE 4.6-2  
MEASURED NOISE LEVELS OF  
COMMON CONSTRUCTION EQUIPMENT**

Equipment	Approximate Noise Level [dB(A)]
Air compressor	81
Backhoe	85
Concrete Mixer	85
Dozer	80
Generator	78
Grader	85
Jackhammer	88
Loader	79
Paver	89
Pneumatic tool	86
Saw	78
Scraper	88
Truck	91

SOURCE: Bolt, Beranek, and Newman 1971.

NOTE: Noise levels at 50 feet from the source.

Construction noise generally can be treated as a point source and would attenuate at approximately 6 dB(A) for every doubling of distance. Thus, a grading noise level of 84 dB(A)  $L_{eq}$  would attenuate to 75 dB(A)  $L_{eq}$  at approximately 140 feet from the noise source.

Project construction activities would occur over the entire project site and would not be situated at any one location for a long period of time. Therefore, for the purpose of modeling future construction noise, the acoustic center of the project construction activity was assumed to be the center of the entire project site. Residences to the south,

southeast, and east are approximately 380, 390, and 450 feet, respectively, from the center of the project site/grading area. Given these distances and the construction noise drop-off rate of 6 dB(A) for every doubling distance, construction noise levels are projected to be within City standards (i.e., below 75 dB(A)) for all sensitive receivers. Construction noise associated with project implementation would therefore not be significant.

In accordance with the City's Noise Abatement and Control Ordinance, project construction would be limited to the hours of 7:00 A.M. to 7:00 P.M. Monday through Saturday and would not take place on Sundays or on legal holidays specified in Section 21.04 of the San Diego Municipal Code with the exception of Columbus Day and George Washington's Birthday.

#### **4.6.4.2 Significance of Impacts**

Construction noise levels are not anticipated to exceed 75 dB(A)  $L_{eq}$  at the residential areas. The project would comply with construction time limits as required by the City of San Diego's Noise Abatement and Control Ordinance. Therefore, construction noise impacts would not be significant.

#### **4.6.4.3 Mitigation, Monitoring, and Reporting**

Construction noise impacts would not be significant. No mitigation is required.

### **4.6.5 Issue 3: Traffic Noise**

Would the proposed project expose people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan?

#### **4.6.5.1 Impacts**

##### **a. Roadway Noise Modeling**

Noise generated by future traffic was modeled using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) Version 2.5. The TNM program calculates noise levels at selected receiver locations using input parameter estimates such as projected hourly average traffic rates; vehicle mix, distribution, and speed; roadway lengths and gradients; distances between sources, barriers, and receivers; and shielding provided by intervening terrain, barriers, and structures.

Both existing and future traffic volumes on Mission Gorge Road were obtained from the Traffic Impact Analysis prepared for the Archstone – Mission Gorge project by Rick Engineering on July 23, 2008. Existing (year 2008) traffic volumes on Mission Gorge

Road between Old Cliffs Road and Greenbrier Avenue is 26,890 ADT. Future (year 2030) traffic volumes on Mission Gorge Road along this segment would be 61,750 ADT.

Table 4.6-3 summarizes the future traffic parameters used in the roadway noise modeling analysis. An average traffic speed of 55 mph was used in the analysis of future traffic noise, and is considered conservative as the roadway would be operating at capacity, which tends to reduce speeds. The future traffic mix for Mission Gorge Road was based on the field traffic counts and was assumed to be 93.5 percent autos, 0.1 percent motorcycles, 3.2 percent medium trucks, 1.1 percent buses, and 2.1 percent heavy trucks.

**TABLE 4.6-3  
YEAR 2030 ROADWAY TRAFFIC PARAMETERS**

Roadway	ADT	Percent					Speed (mph)
		Autos	Motor- cycles	Medium Trucks	Buses	Heavy Trucks	
Mission Gorge Road	61,750	93.5	0.1	3.2	1.1	2.1	55

The day, evening, and nighttime traffic distribution for all roadways was assumed to be 77 percent daytime traffic, 10 percent evening traffic, and 13 percent nighttime traffic. With these assumptions, the CNEL is approximately 2 dB above the average daytime hourly equivalent noise level.

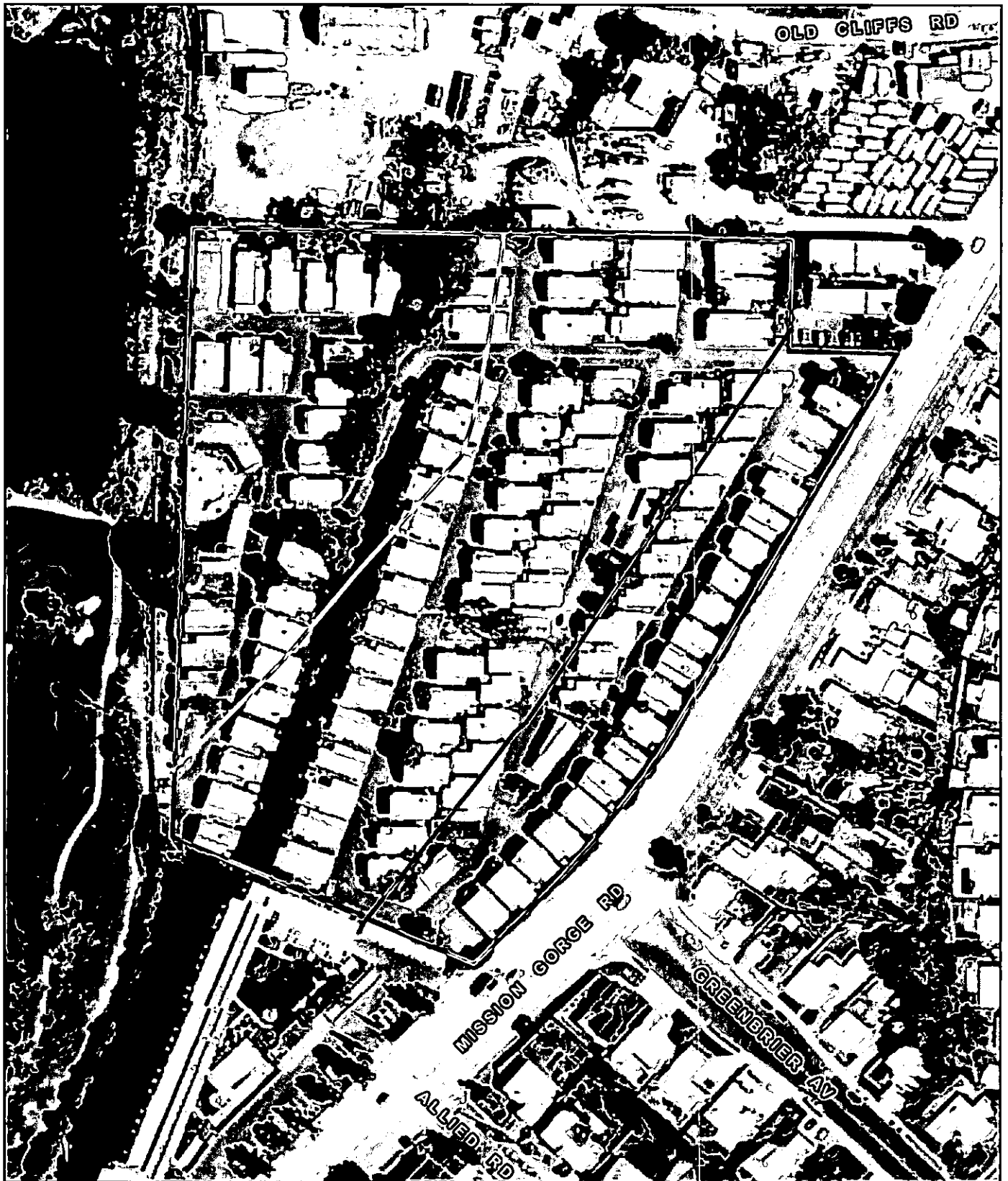
Noise levels were modeled for 55 ground-floor receivers located throughout the project area to determine the future exterior noise contours over the project site due to traffic on area roadways. Exterior noise levels were also modeled for a series of exterior useable areas and for receiver locations.

## **b. Exterior Noise**

The resulting noise contours are shown in Figure 4.6-2. These projected noise contours take into account the future graded condition of the site based on the proposed grading plan, but do not take into account any shielding provided by the proposed buildings.


As shown in Figure 4.6-2, future traffic noise levels are projected to exceed 65 CNEL over the entire project site.

Noise levels were also modeled for a series of 18 receivers, as shown in Figure 4.6-3. Receivers 10 and 13 through 17 are located at the proposed exterior usable areas. These areas would include the recreation/pool area and the courtyards which are proposed as part of the project open space requirements as shown in Figure 3-3 of the Project Description. Noise levels were modeled at first-floor receivers to determine compliance with the City's exterior standard of 65 dB(A) CNEL. Projected noise levels at these exterior usable locations account for the effects of topography and shielding




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0 Feet 150

 Project Boundary

**Projected Noise Contours:**

 70 CNEL


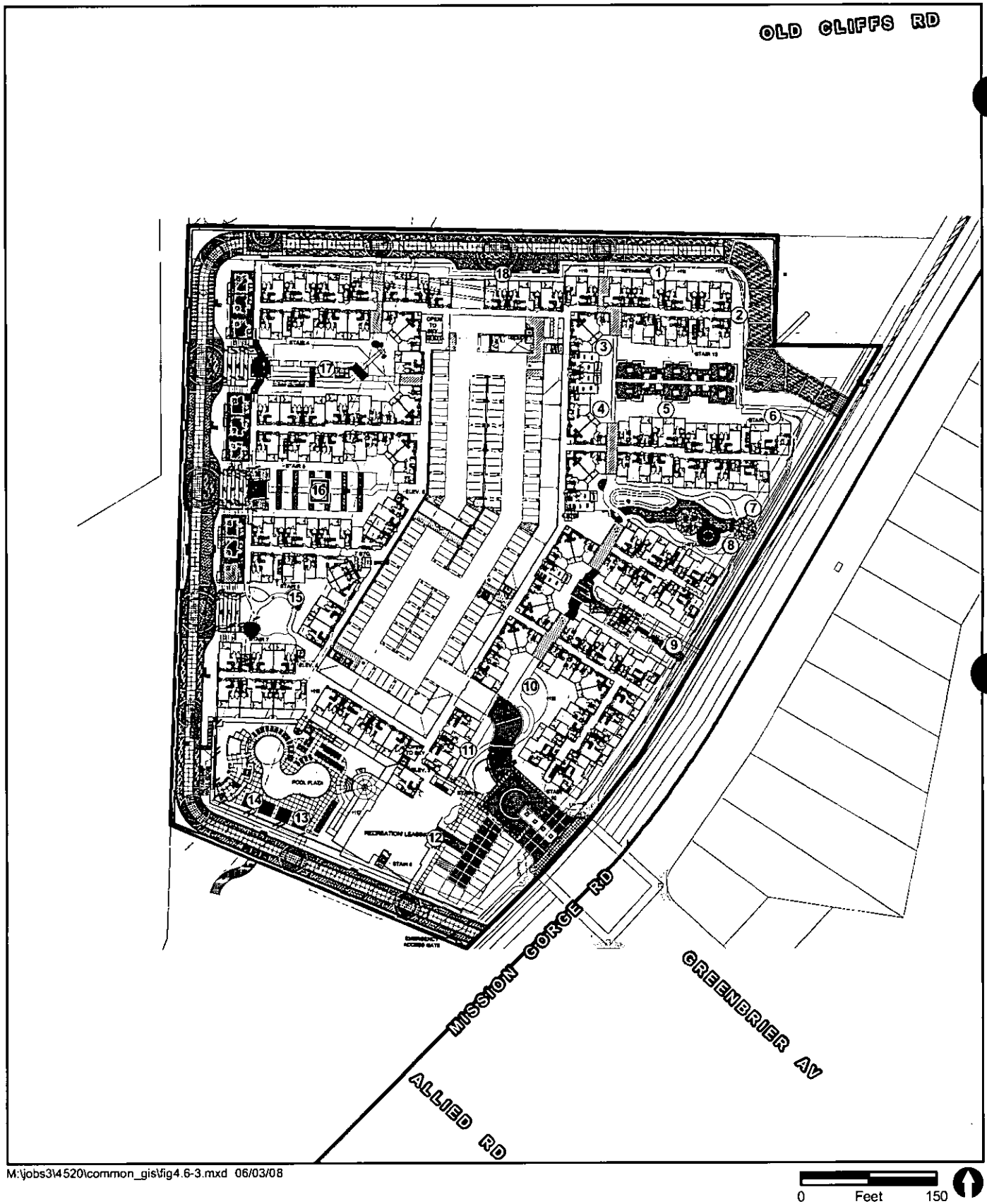
 75 CNEL

FIGURE 4.6-2

Future Projected Traffic Noise Contours

000386



- Project Boundary
- Modeled Noise Receivers

**FIGURE 4.6-3**  
Modeled Receivers

000387

provided by the proposed multi-family and recreation buildings at the perimeter of the project site as well as the existing neighboring buildings to the south and the existing church to the northeast.

Table 4.6-4 indicates that the projected future vehicle traffic noise levels at these modeled exterior useable area receivers are not expected to exceed the City's significance threshold. As seen from this table, noise levels at the recreation/pool area and the courtyards included as project open space requirements are not projected to exceed 65 dB(A) CNEL. Thus, exterior noise impacts would be less than significant.

**TABLE 4.6-4  
FUTURE PROJECT EXTERIOR NOISE LEVELS**

Receiver	Location	Noise Level (CNEL)			
		First-Floor	Second-Floor	Third-Floor	Fourth-Floor
1	Building Face	65	65	65	65
2	Building Face	70	70	71	72
3	Building Face	64	64	63	63
4	Building Face	65	64	64	64
5	Building Face	67	67	67	68
6	Building Face	72	73	73	73
7	Building Face	78	78	78	78
8	Building Face	78	78	78	78
9	Building Face	79	78	78	77
10	Courtyard	64	64	65	66
11	Building Face	71	71	71	72
12	Building Face	74	74	75	75
13	Pool	58	N/A	N/A	N/A
14	Pool	61	N/A	N/A	N/A
15	Courtyard	36	39	40	41
16	Courtyard	40	41	42	44
17	Courtyard	38	38	41	45
18	Building Face	62	63	63	63

N/A = not applicable.

### c. Interior Noise

Receivers 1 through 9, 11, 12, and 18 were placed at the faces of buildings to determine the need for an interior noise study. Noise levels were modeled at first-, second-, third-, and fourth-floor receivers to determine the need for an interior noise study. Noise levels at these locations include the effects of topography and shielding provided by the proposed buildings at the perimeter of the project site as well as the existing neighboring buildings to the south and the existing church to the northeast.

Table 4.6-4 indicates the projected future noise levels at these receivers. As shown in Table 4.6-4, the first-, second-, third-, and fourth-floor exterior noise levels would exceed 60 dB(A) CNEL at receivers on the eastern half of the project site. Therefore, interior

noise levels would exceed 45 dB(A) CNEL, the significance threshold, for the buildings on the eastern half of the project site and would be considered to be significant.

#### **4.6.5.2 Significance of Impacts**

As discussed above, exterior noise levels are not projected to exceed 65 dB(A) CNEL at the recreation/pool area or the courtyards included as project open space. Thus, residents would not be exposed to noise levels in excess of the significance criteria for exterior useable areas and exterior noise impacts would not be significant.

Since interior noise levels could exceed 45 dB(A) CNEL for the buildings on the eastern half of the project site, interior noise impacts would be considered significant without mitigation. Mitigation would be required to ensure that interior noise levels in this location would not exceed 45 dB(A) CNEL. Where exterior noise levels are projected to exceed 60 dB(A) CNEL for residential units on the eastern half of the project site (Figure 4.6-4), windows would need to be closed in order to achieve the necessary exterior to interior noise reduction [45 dB(A) CNEL]. Consequently, the design for these affected units would include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed. With the use of windows and doors with extra insulation, interior noise levels can be reduced to meet the noise standards.

#### **4.6.5.3 Mitigation, Monitoring, and Reporting**

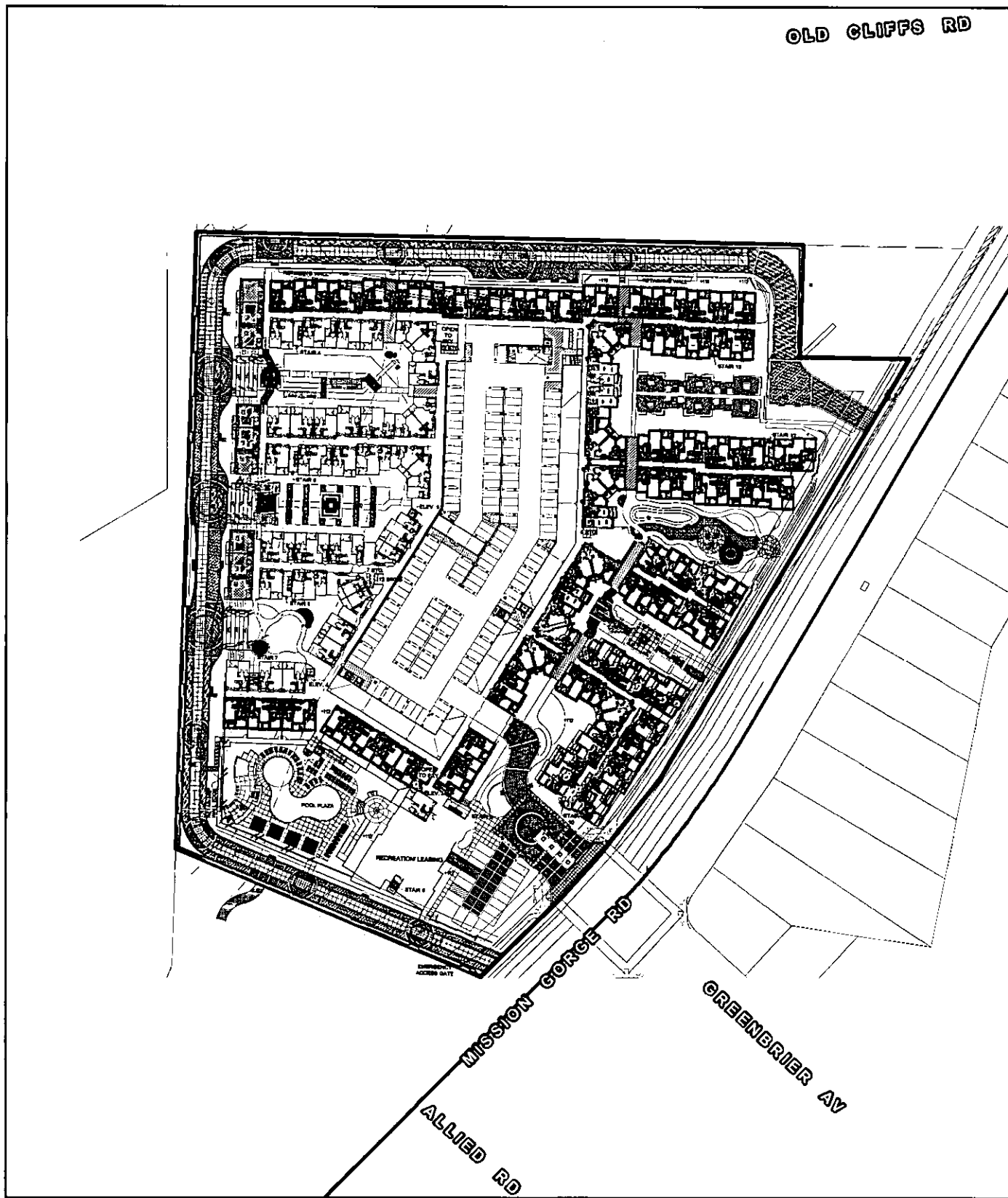
The following measures would reduce interior noise levels at the buildings which would be exposed to exterior noise levels greater than 60 dB(A) CNEL.

##### ***Mitigation Measure***

1. Prior to the issuance of building permits for the units at the eastern half of the project site as shown in Figure 4.6-4, the applicant shall submit a detailed acoustical analysis to document that interior noise levels would be below the 45 dB(A) CNEL standard. The analysis shall consider all habitable rooms of the affected units.

#### **4.6.5.4 Significance of Impacts After Mitigation**

The applicant shall be required to prepare a detailed acoustical analysis to ensure that construction techniques would reduce interior noise to a level that is less than significant.



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- Project Boundary
- Buildings with Noise Exceeding 60 CNEL

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**FIGURE 4.6-4**  
Buildings Exceeding 60 CNEL

## 4.7 Biological Resources

RECON biologists performed a general biological survey of the approximately 10.22-acre project site to determine the current condition of the biological resources within the project boundary. The findings of the biological technical report are summarized below and the report is included as Appendix J to this Draft EIR.

### 4.7.1 Existing Conditions

#### 4.7.1.1 Existing Flora and Fauna

##### a. Flora

Only one land cover type occurs on the property: developed land (Figure 4.7-1). The developed land totals 10.22 acres and includes ornamental vegetation. A total of 26 plant species were identified on the site. Of these 26 species, 3 are considered native to California and 23 are considered non-native species.

##### b. Fauna

Wildlife species observed were typical of urban settings. Common bird species detected during the survey include mourning dove (*Zenaidura macroura marginella*), Anna's hummingbird (*Calypte anna*), house finch (*Carpodacus mexicanus frontalis*), and America crow (*Corvus brachyrhynchos hesperis*).

#### 4.7.1.2 Sensitive Species

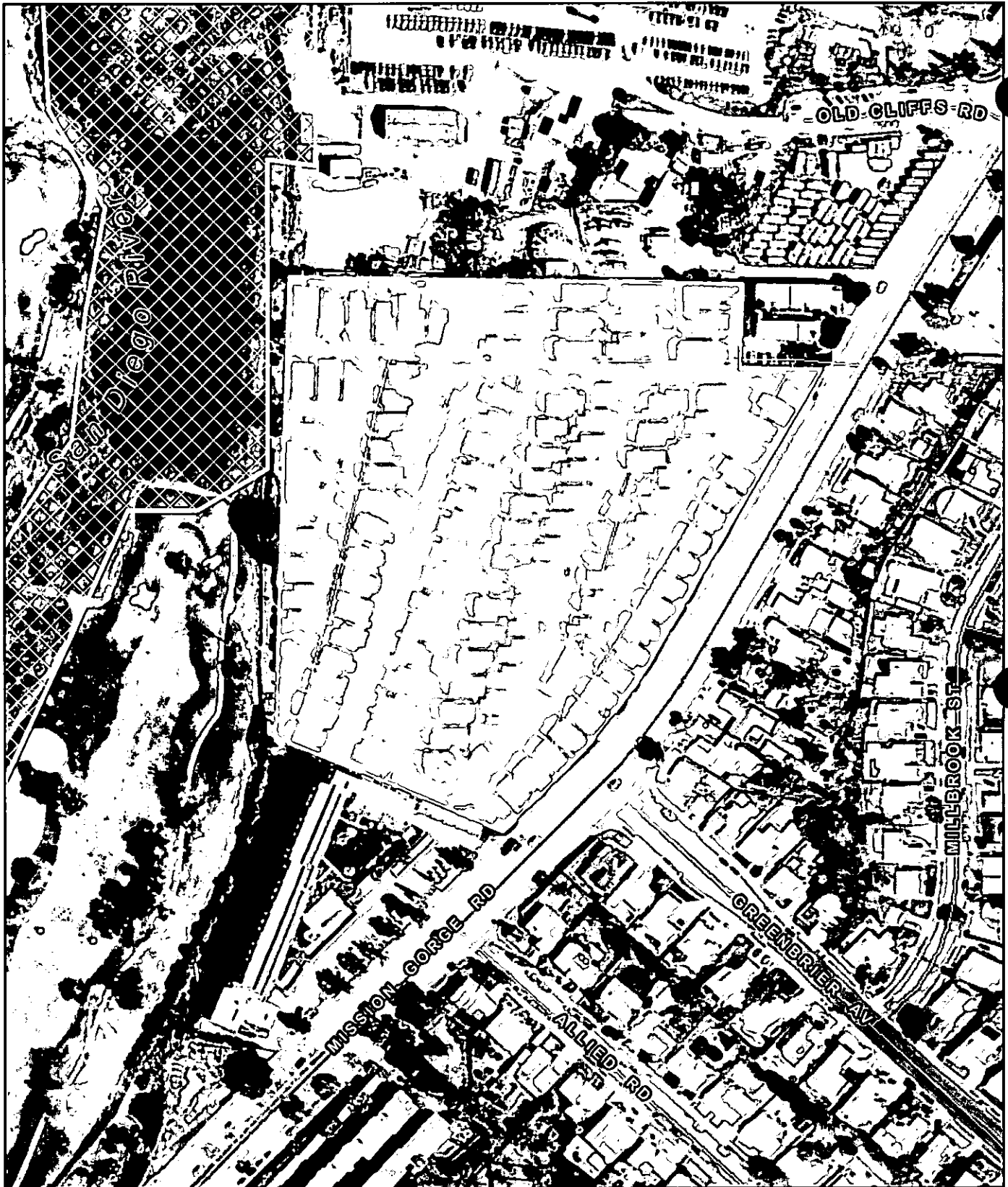
Assessments for the potential occurrence of sensitive species were based upon known ranges, habitat preferences for the species, species occurrence records from the California Natural Diversity Database (CNDDB), and species occurrence records from other sites in the vicinity of the project site.

##### a. Sensitive Vegetation Communities

There are no vegetation communities within the project boundary that are considered sensitive under the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan (City of San Diego 1997).

##### b. Sensitive Plants

No sensitive plants were detected during the survey and none are expected to occur within the project boundary, as it is dominated by ornamental plants and developed land. Species that are known to occur in the project vicinity (within two miles of the project



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- Project Boundary    Vegetation Community / Landcover Types:
- MHPA    Developed Land

FIGURE 4.7-1  
Biological Resources

000302

site), which are federally listed threatened or endangered, or are considered a City of San Diego narrow endemic, are discussed in Appendix J. Appendix J lists sensitive plant species, their status, and their potential for occurrence. None of the species discussed in Appendix J are expected to occur due to the species' range or a lack of suitable habitat.

### **c. Sensitive Wildlife**

No sensitive wildlife species were detected on-site during the survey; however, the project site is adjacent to Multiple Habitat Planning Area (MHPA) land, in which several sensitive species have been known to occur (State of California 2007a). All sensitive wildlife species known to occur in the project vicinity (within two miles of the survey area) that are federally listed threatened or endangered or that have potential to occur based on species range are addressed in Appendix J.

#### **4.7.1.3 Sensitive Wildlife Species Potentially Occurring But Not Detected On-Site**

##### **a. Least Bell's Vireo (*Vireo bellii pusillus*)**

The least Bell's vireo is federally and state listed as endangered and is a MSCP covered species. The species is exclusively found in riparian habitats, including cottonwood-willow woodlands and forests, oak woodlands, and mule fat scrub, and requires dense cover for nesting (U.S. Fish and Wildlife Service [USFWS] 1998). Populations of least Bell's vireo have declined drastically due to extensive loss of riparian habitat to agricultural and urban development, including channelization and mining of streams, and nest parasitism by brown-headed cowbirds (*Molothrus ater*). This species is not expected to occur within the project boundary due to the lack of riparian habitat. There is a record of the least Bell's vireo occurring within the riparian habitat along the San Diego River, approximately one mile from the survey area (State of California 2007a).

##### **b. Cooper's Hawk (*Accipiter cooperii*)**

The Cooper's hawk is a California Department of Fish and Game (CDFG) species of special concern and is a MSCP covered species. Cooper's hawk nesting sites are considered sensitive by CDFG. The decline of this species had been caused by urbanization and loss of habitat; however, during the last 20 years, the Cooper's hawk has apparently adapted to urban areas. Cooper's hawk has moderate potential to nest/occur within the project boundary. This species may also forage within the mature pine trees located on the project site.

#### **4.7.1.4 Wetlands**

There were no wetlands found on-site, nor were any wetland plant species detected.

#### **4.7.1.5 Wildlife Movement and Corridors**

Habitat linkages and wildlife corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Habitat linkages and wildlife corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations. These areas are considered sensitive by the City and resource and conservation agencies.

The project site does not contain natural habitat, but is adjacent to the San Diego River which functions as a wildlife corridor linking to Mission Trails Regional Park.

#### **4.7.1.6 Regulatory Framework**

##### **a. Natural Habitat Conservation and Planning**

The Natural Habitat Community Conservation Planning (NCCP) Program was enacted by the State of California in 1991 to provide long-term regional protection of natural vegetation and wildlife diversity while allowing compatible development. The NCCP process was initiated to provide an alternative to single-species conservation efforts (habitat conservation plans). Instead, the NCCP is intended to provide a regional approach to the protection of species within a designated natural community. In the City of San Diego, the MSCP is an outgrowth of this planning.

##### **b. Multiple Species Conservation Program (MSCP)**

The MSCP is a comprehensive, habitat conservation planning program for San Diego County. Local jurisdictions, including the City of San Diego, implement their portions of the MSCP Plan through subarea plans, which describe specific implementing mechanisms. The City of San Diego's MSCP Subarea Plan was approved in March 1997. The MSCP Subarea Plan is a plan and process for the issuance of permits under the federal and state Endangered Species Act and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City of San Diego signed an Implementing Agreement with the USFWS and the CDFG. The Implementing Agreement serves as a binding contract between the City, the USFWS, and the CDFG that identifies the roles and responsibilities of the parties to implement the MSCP and subarea plan. The agreement allows the City to issue incidental take authorizations under the provisions of the MSCP. Applicable state

and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

### **c. Multi-Habitat Planning Area (MHPA)**

One of the primary objectives of the MSCP is to identify and maintain a preserve system which allows for animals and plants to exist at both the local and regional levels. The MSCP has identified large blocks of native habitat having the ability to support a diversity of plant and animal life known as "core biological resource areas." "Linkages" between these core areas provide for wildlife movement. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. Input from responsible agencies and other interested participants resulted in creation of the City's MHPA. The MHPA is the area within which the permanent MSCP preserve would be assembled and managed for its biological resources. MHPA lands are considered by the City to be a sensitive biological resource.

As shown in Figure 4.7-1, the project site is outside, but adjacent to, the City of San Diego's MHPA associated with the San Diego River. This portion of the river is within the Urban Areas of the MSCP which contains lands consisting of canyons with native habitats in relative proximity to other MHPA areas providing habitat.

In accordance with the MSCP, for parcels located outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species." However, "impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance" with the City's Biological Guidelines (City of San Diego 2001).

To address the integrity of the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. The adjacency guidelines are intended to be addressed on a project-by-project basis either in the planning or management stage. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasives, brush management, and grading/development.

### **d. Land Development Code**

The City of San Diego has developed a set of Biological Survey Guidelines which are to be used as part of the environmental review process to meet the requirements of CEQA, the MSCP, and the ESL. The proposed project site is designated as ESL due to its location within the floodplain. However, the site does not contain sensitive biological resources according to the ESL definition:

The ESL defines sensitive biological resources as those lands included in the MHPA ..., and lands outside of the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, or III; habitat for rare, endangered or threatened species or narrow endemic species.

## 4.7.2 Significance Determination Thresholds

Potential impacts to biological resources are assessed through review of the project's consistency with the City's Environmentally Sensitive Lands regulations, Biology Guidelines, and MSCP Subarea Plan. Before a determination of the significance of an impact can be made, the presence and nature of the biological resources must be established. Thus, significance determination, pursuant to the City of San Diego's Significance Determination Thresholds (2007), proceeds in two steps. The first step consists of determining if significant biological resources are present. The second step is to determine the sensitivity of identified biological resources in terms of direct, indirect, and cumulative impacts that would result from project implementation.

### 4.7.2.1 Biological Resources Determination

Pursuant to the City of San Diego's Significance Determination Thresholds, existence of any of the following situations associated with the proposed project site may indicate the presence of significant biological resources:

- The site has been identified as part of the MHPA by the City's MSCP's Subarea Plan.
- The site supports or could support Tier I, II, IIIA & B vegetation communities (such as grassland, chaparral, coastal sage scrub, etc.).
- The site contains, or comes within 100 feet of a natural or man-made drainage. The site lies within the 100-year floodplain established by the Federal Emergency Agency (FEMA), and the Flood Plain Fringe (FPF)/Flood Way (FW) zones.
- The site does not support a "covered" (per MSCP) vegetation community; however, important wildlife species may use the site for a corridor, etc.

### 4.7.2.2 Biological Impacts Determination

Pursuant to the City of San Diego's Significance Determination Thresholds, occurrence of any of the following situations associated with identified biological resources may indicate significant direct and indirect biological impacts.

### **a. Direct Impacts**

- Any encroachment in the MHPA is considered a significant impact to the preservation goals of the MSCP. Any encroachment into the MHPA (in excess of the allowable encroachment by a project) would require a boundary adjustment which would include a habitat equivalency assessment to ensure that what will be added to the MHPA is at least equivalent to what would be removed.
- Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats. Impacts to these resources may be considered significant.
- Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to state or federally listed species and all narrow endemics should be considered significant.
- Certain species covered by the MSCP and other species not covered by the MSCP may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.

### **b. Indirect Impacts**

The Significance Determination Guidelines indicate that depending on the circumstances, indirect effects of a project may be as significant as the direct effects of the project. Indirect effects include, but are not limited to, the following impacts:

- Introduction of urban meso-predators into a biological system.
- Introduction of urban runoff into a biological system.
- Introduction of invasive exotic plant species into a biological system.
- Noise and lighting impacts.
- Alteration of a dynamic portion of a system, such as stream flow characteristics or fire cycles.
- Loss of a wetland buffer that includes no environmentally sensitive lands.

## **4.7.3 Issue 1: Sensitive Species**

Would the proposed project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFG or USFWS?

### 4.7.3.1 Impacts

There is no natural vegetation on-site; thus, construction of the proposed project would not remove any habitat for sensitive species. No sensitive plants were found on-site and none are expected to occur within the project boundary, as it is dominated by ornamental plants and developed land.\* Thus, there would be no impacts to sensitive plant species as a result of the proposed project. In addition, no sensitive wildlife was observed or expected to use the project site. However, indirect impacts to two sensitive wildlife species which may inhabit the adjacent San Diego River could result from construction of the project.

Project construction activities could be disruptive to the least Bell's vireo should it be present or nesting adjacent to the site. As this is a federally listed species, impacts would be considered significant. Construction activities can also create impacts to nesting raptors when they cause the removal of an active nest or nest abandonment. Because there is a moderate potential for Cooper's hawk to nest in the mature pine trees within the project area, impacts would be considered significant.

### 4.7.3.2 Significance of Impacts

No sensitive plant species were detected on the project site; thus, project impacts would be less than significant. While no sensitive wildlife species were detected within the project boundaries, the least Bell's vireo and Cooper's hawk are both sensitive wildlife species that could potentially occur on or adjacent to the project site. Because construction activities could be disruptive to these birds, project impacts would be significant.

### 4.7.3.3 Mitigation, Monitoring, and Reporting

Project mitigation measures are necessary to ensure avoidance or reduction of impacts to sensitive wildlife species to a level that is less than significant.

#### a. Least Bell's Vireo

##### ***Mitigation Measure***

In order to avoid or reduce potential indirect and construction impacts to the least Bell's vireo, the applicant shall implement the following mitigation measure:

Prior to the issuance of any grading permit, the Assistant Deputy Director's (ADD) Environmental Designee (ED) shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans:

NO CLEARING, GRUBBING, GRADING, OR OTHER CONSTRUCTION ACTIVITIES SHALL OCCUR BETWEEN MARCH 15 AND SEPTEMBER 15, THE BREEDING SEASON OF THE LEAST BELL'S VIREO, UNTIL THE FOLLOWING REQUIREMENTS HAVE BEEN MET TO THE SATISFACTION OF THE ADD ED:

- A. A qualified biologist shall survey those wetland areas that would be subject to construction noise levels exceeding 60 decibels dB(A) hourly average for the presence of the least Bell's vireo. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife service within the breeding season prior to the commencement of construction. If the least Bell's vireo is present, then the following conditions must be met:

Between March 15 and September 15, no clearing, grubbing, or grading of occupied least Bell's vireo habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and

Between March 15 and September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied least Bell's vireo or habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ADD ED at least two weeks prior to the commencement of construction activities. Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or

At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the least Bell's vireo. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring\* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate

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noise attenuation is achieved or until the end of the breeding season (September 16).

\*Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the ADD ED, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- B. If least Bell's vireo are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the ADD ED and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 15 and September 15 as follows:
- I. If this evidence indicates the potential is high for least Bell's vireo to be present based on historical records or site conditions, then condition A.III shall be adhered to as specified above.
  - ii. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

#### **b. Raptors (Cooper's Hawk)**

##### ***Mitigation Measure***

In order to avoid or reduce potential indirect and construction impacts to nesting raptors, the applicant shall implement the following mitigation measure:

Prior to the issuance of any grading permit, the ADD ED shall verify that the following project requirements regarding the ~~least Bell's vireo~~ Cooper's hawk are shown on the construction plans:

NO CLEARING, GRUBBING, GRADING, OR OTHER CONSTRUCTION ACTIVITIES SHALL OCCUR BETWEEN FEBRUARY 1 AND SEPTEMBER 15, THE RAPTOR BREEDING SEASON, UNTIL THE FOLLOWING REQUIREMENTS HAVE BEEN MET TO THE SATISFACTION OF THE ADD ED:

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## I. PRE-CONSTRUCTION

### A. Pre-Grading Survey

1. If project grading is proposed during the raptor breeding season (February 1-September 15), the project biologist shall conduct a pre-grading survey for active raptor nests in within 300 feet of the development area and submit a letter report to Mitigation, Monitoring, and Coordination (MMC) prior to the preconstruction meeting.
  - a. If active raptor nests are detected, the report shall include mitigation in conformance with the City's Biology Guidelines (i.e., appropriate buffers, monitoring schedules, etc.) to the satisfaction of the ADD ED. Mitigation requirements determined by the project biologist and the ADD Environmental Designee shall be incorporated into the project's Biological Construction Monitoring Exhibit (BCME) and monitoring results incorporated in to the final biological construction monitoring report.
  - b. If no nesting raptors are detected during the pre-grading survey, no mitigation is required.

### 4.7.3.4 Significance of Impacts After Mitigation

Implementation of the mitigation measures outlined above would reduce potential sensitive species impacts to a level that is less than significant.

### 4.7.4 Issue 2: Sensitive Habitats

*Would the proposed project result in a substantial adverse impact on any Tier I Habitats, Tier II, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS?*

#### 4.7.4.1 Impacts

The proposed project would develop or landscape the entire 10.22-acre project site. However, the project site supports developed land and ornamental vegetation only. There are no Tier I, Tier II, Tier IIIA, or Tier IIIB habitats located on-site. Thus, the project would not directly impact any sensitive natural communities or habitats.

Indirect impacts to sensitive natural communities or habitats are discussed in the context of MHPA Adjacency in Section 4.7.7 below.

#### **4.7.4.2 Significance of Impacts**

As the project site does not contain any native habitats, the project would not directly impact any sensitive natural communities or habitats.

### **4.7.5 Issue 3: Wetlands**

Would the proposed project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

#### **4.7.5.1 Impacts**

The project site does not contain any wetlands, wetland plant species, or vernal pools; thus there would be no direct impacts to wetlands as a result of project implementation. However, the project site is located adjacent to the San Diego River and surface runoff from the project site eventually discharges to the San Diego River (see Section 4.9, Hydrology). Therefore, any riparian vegetation or wetland habitat along the San Diego River would have a potential to be adversely affected by potential surface runoff and sedimentation during the construction and operation of the proposed project. However, BMPs would be implemented in accordance with local and state water quality regulations that would reduce potential impacts to below significance (see Section 4.8 Water Quality).

#### **4.7.5.2 Significance of Impacts**

The site does not contain any wetlands, but has a potential to impact riparian vegetation or wetland habitat along the San Diego River due to surface runoff and sedimentation during the construction and operation of the project. Potential impacts would be reduced to below a level of significance with implementation of required BMPs (see Section 4.8, Water Quality).

#### **4.7.5.3 Mitigation, Monitoring, and Reporting**

Water quality BMPs would be implemented as part of the grading and building permit process in order to prevent impacts associated with surface runoff and sedimentation (see Section 4.8, Water Quality). Thus, no mitigation would be required.

### **4.7.6 Issue 4: Wildlife Corridors**

Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native or resident

migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nurseries?

#### **4.7.6.1 Impacts**

Wildlife movement within the project area focuses on the San Diego River which is part of the adopted MHPA open space system. The proposed project would not remove any natural habitat nor would it encroach into the San Diego River MHPA. Therefore, the project would not interfere with this wildlife corridor and would not have a significant impact to wildlife movement.

#### **4.7.6.2 Significance of Impacts**

As the proposed project would not remove any natural habitat nor encroach into the San Diego River open space system, it would not have a significant impact on wildlife movement.

#### **4.7.6.3 Mitigation, Monitoring, and Reporting**

The proposed project would not have a significant effect on wildlife movement and no mitigation is required.

### **4.7.7 Issue 5: MSCP**

Would the proposed project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP or in the surrounding area?

#### **4.7.7.1 Impacts**

As described above in existing conditions, the project site does not contain any natural habitat and does not support any sensitive species. While the project site is not identified as a preserve area within the MSCP, it is adjacent to the San Diego River which is a preserve area within the urban areas section of the MSCP. The MSCP does not include any management objectives directly applicable to the proposed project. Thus, the proposed project would not conflict with the provisions of the MSCP and no significant impacts would result. However, the MHPA Land Use Adjacency Guidelines would apply to the proposed project due to the fact that the site is adjacent to the San Diego River MHPA. The adjacency guidelines are discussed below (Section 4.7.8, Issue 8: MHPA).

### **4.7.7.2 Significance of Impacts**

There are no provisions of the MSCP that directly apply to the proposed project. Thus, impacts would be less than significant. Project implementation would have indirect impacts on the adjacent San Diego River MHPA as addressed below.

### **4.7.7.3 Mitigation, Monitoring, and Reporting**

The project would not have a significant direct impact associated with the provisions of the MSCP and no mitigation is required.

## **4.7.8 Issue 6: Edge Effects**

Would the proposed project introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?

### **4.7.8.1 Impacts**

The MHPA has been designed to maximize conservation of sensitive biological resources, including sensitive species. When land is developed adjacent to the MHPA, there is a potential for indirect impacts, or edge effects, that may degrade the habitat value or disrupt animals within the preserve area. These impacts could be short term, resulting from construction activities, or long term. Short-term construction impacts could result in disruption of nesting and breeding and could thus affect the population of sensitive species. Long-term impacts would be associated with drainage, toxins/water quality, lighting, noise, barriers, invasives, brush management, and land development. The MSCP contains guidelines (MHPA Land Use Adjacency Guidelines) for development adjacent to the MHPA where adverse edge effects may be significant. A description of the project in relation to these MHPA Land Use Adjacency Guidelines is provided below:

#### **a. Land Use Adjacency Guidelines**

##### ***Drainage***

As in the existing condition and with agreement by the property owner (U.S. Navy), runoff would be discharged onto the golf course property within the San Diego River along the western side of the property. Whereas the runoff is currently conveyed through roads and ditches and discharge locations consist of concentrated discharges and sheet flow discharge, the proposed project improvements to collect runoff in inlets and convey it in an underground stormdrain system with two outlets. Post-project flows would be detained on-site so as not to exceed pre-project flows at the outlet points. In addition, the project rip-rap slope protection at the location of the two outlets of the storm

drains to serve as an energy dissipater and reduce the flow velocities at the storm drain discharge locations. The drainage system designed for the project would ensure that long-term drainage impacts would not occur as discussed in more detail in Section 4.9, Hydrology. However, short-term erosion impacts could result from grading activities during construction. Construction impacts are potentially significant.

### ***Toxins/Water Quality***

The project would not result in the production of any toxics, stockpiling of manure or agricultural products, or any chemicals that could adversely affect natural resources within the MHPA. Poor water quality can affect vegetation, aquatic animals, or terrestrial wildlife that depends upon water resources. With implementation of BMPs into the project design, potential water quality impacts to the adjacent MHPA would be avoided (see Section 4.8, Water Quality). Therefore, the project is not expected to decrease water quality or affect vegetation, aquatic animals, or terrestrial wildlife that depends upon water resources.

### ***Lighting***

Nighttime lighting on native habitats can provide nocturnal predators with an unnatural advantage over their prey. This could cause an increased loss in native wildlife that could be a significant impact unless mitigated. Project lighting has been designed consistent with the City's lighting regulations (Section 142.0740 of the Land Development Code) intended to minimize light pollution and would be directed away from native habitat.

### ***Noise***

Increased noise has the potential to be disruptive to wildlife, especially during the breeding season, and would potentially affect the population of sensitive species including the least Bell's vireo and Cooper's hawk. Adverse response to increased noise may include hearing loss or temporary masking of vocalizations commonly used during the breeding season, nest abandonment and decrease in predator awareness, resulting in a decrease in reproductive and overall fitness of noise-sensitive species. Sources of urban noise associated with the project would not increase ambient noise to levels that would create a significant nuisance to surrounding wildlife resources. However, construction noise, though short term, could result in significant impacts during the breeding season (See discussion of impacts and mitigation in Section 4.7.3.3).

### ***Barriers***

The proposed project would not obstruct any habitat linkages for large- or medium-sized mammals, birds, or reptiles. Further, site development would not adversely affect wildlife movement between or within any MHPA. Barriers such as fencing and assigned

pedestrian walkways have been incorporated into the project design to limit and control public access into the MHPA.

### ***Invasives***

The Landscape Development Plans for the proposed project do not include any invasive (non-native exotic species) plants in areas adjacent to the MHPA. As described in Chapter 3.0, Project Description, the landscape plant palette for the areas adjacent to the MHPA shall only include native, drought-tolerant and low-fuel plant species. These measures, which are incorporated into the project design, ensure that indirect effects due to invasive species would not occur. In addition, existing invasive species located on the subject site (*Tamarix* sp. and *Arundo donax* L.) shall be removed as part of the proposed project and per the California Invasive Plant Council's (Cal-IPC) Invasive Plant Inventory and the prohibited plant species list found in Table 1 of the Land Development Manual, Landscape Standards.

### ***Brush Management***

The proposed project is not subject to brush management requirements; therefore, the indirect effects of brush management would not be a significant impact to biological resources.

### ***Grading/Land Development***

Project development would lead to an increase in human presence at the project site. An increase in human activity in the area could lead to further fragmentation of habitat and the degradation of sensitive habitat if people or pets wandered outside the developed area. Additionally, illegal dumping of green waste, trash, or other refuse could occur, which would negatively impact adjacent habitat. However, the proposed project, while located in an area surrounded by urban development, has been designed as a good neighbor to the MHPA to the west (see Section 3.6.1, San Diego River Interface) by providing perimeter fencing as a barrier between the development and MHPA area.

## **4.7.8.2 Significance of Impacts**

As the project site is adjacent to the MHPA and sensitive resources associated with the San Diego River, there is a potential for significant indirect impacts due to project development.

## **4.7.8.3 Mitigation, Monitoring, and Reporting**

### ***Mitigation Measure***

Section 4.1.5.3, Land Use, specifies the mitigation measure for impacts addressing MHPA adjacency.

#### **4.7.8.4 Significance of Impacts After Mitigation**

Implementation of the mitigation measures outlined in Section 4.1.5.3 would reduce potential MHPA adjacency impacts to a level that is less than significant.

### **4.7.9 Issue 7: Policies and Ordinances**

Would the proposed project conflict with any local policies or ordinances protecting biological resources?

#### **4.7.9.1 Impacts**

In addition to the MSCP, the City of San Diego relies on the ESL, as implemented through the Biological Survey Guidelines, for protection of sensitive biological resources. As defined by the ESL, the project site does not contain any sensitive biological resources, but is adjacent to MHPA lands, which is considered a sensitive resource. The proposed project is consistent with the ESL as it will not result in any direct impacts to sensitive biological resources and potential indirect impacts associated with the adjacent MHPA lands will be avoided through project mitigation as discussed above. Thus, there would be no significant impacts with regard to local policies or ordinances.

#### **4.7.9.2 Significance of Impacts**

The proposed project would be consistent with the ESL in relation to sensitive biological resources. Impacts would be less than significant.

#### **4.7.9.3 Mitigation, Monitoring, and Reporting**

Impacts would be less than significant and no mitigation is required.

### **4.7.10 Issue 8: Invasive Species**

Would the proposed project introduce invasive species of plants into a natural open space area?

#### **4.7.10.1 Impacts**

Invasives are aggressive non-native plant species that threaten natural habitats by outcompeting native species and reducing biodiversity. These plants thrive in areas disturbed by activities such as grading, construction, and off-road-vehicle use or fire.

The Landscape Development Plan and Plant Palette for the proposed project shall not include any invasive (non-native, exotic) plant species in areas adjacent to the MHPA. Since invasive species would not be introduced adjacent to the MHPA, no significant impacts would occur. In addition, all existing invasive plant species, including vegetative parts and root systems, shall be completely removed from the premises as per LDC Section 142.0403(b)(2) of the Landscape Regulations.

#### **4.7.10.2 Significance of Impacts**

The proposed project would not introduce invasive species into the San Diego River MHPA; therefore, no significant impacts would occur.

#### **4.7.10.3 Mitigation, Monitoring, and Reporting**

No significant impacts associated with invasive species would occur and no mitigation is required.

## 4.8 Water Quality

The following water quality analysis is based on the Water Quality Technical Report (WQTR) prepared by Rick Engineering in February 2008. The WQTR evaluates potential water quality impacts to downstream waters and measures incorporated into the proposed project to reduce impacts to downstream waters and habitat. This technical report is included in its entirety as Appendix K of this EIR.

### 4.8.1 Existing Conditions

#### 4.8.1.1 Impaired Receiving Waters

As described in the Hydrology section, 4.9, the project site is located within the Mission San Diego Hydrologic Subarea (HSA), Basin Number 907.11, of the Lower San Diego Hydrologic Area and San Diego Hydrological Unit and drains into the San Diego River and eventually into the Pacific Ocean. Beneficial uses of the San Diego River include agricultural, industrial, recreational, warm and cold freshwater habitat, wildlife habitat, and rare, threatened, or endangered species. The San Diego River is exempt from municipal beneficial uses based on the RWQCB 1989 Resolution 89-33 which identified water courses or bodies that do not support sources of drinking water. The beneficial uses of the coastal lagoon at the mouth of the San Diego River include recreational, commercial and sport fishing, estuarine habitat, marine habitat, migration of aquatic organisms, shellfish harvesting, wildlife habitat, and rare, threatened, or endangered species. Beneficial uses of the groundwater in the Mission San Diego Hydrologic Subarea (HSA) include agricultural, industrial, and industrial process supply.

According to the 2006 State Impaired Water Bodies 303(d) List of Water Quality Limited Segments, the San Diego River is currently impaired. The pollutants causing the impairment of the San Diego River are nutrients, organic compounds, trash and debris, oxygen demanding substances, phosphorous, total dissolved solids (calcium, phosphates, nitrates, sodium, potassium, and chloride), and pesticides.

#### 4.8.1.2 Existing Pollutant Discharge

Pursuant to the City's Storm Water Applicability Checklist, the project site currently discharges runoff to a Water Quality Sensitive Area. There are currently no runoff treatment management practices being employed on-site or off-site to treat runoff from the existing mobile home park before being discharged into the San Diego River. Runoff from the mobile home park is likely contaminated with pollutants typical of urban development, including nutrients from fertilizers and eroded soils, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease from leaking vehicles or illegal dumping, bacteria and viruses from pet waste, and pesticides.

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Because the project site discharges onto the adjacent golf course located within the San Diego River floodplain, these pollutants are ultimately discharged into the currently impaired receiving waters of the San Diego River.

### 4.8.1.3 Regulatory Framework

Various federal, state, and local regulations provide requirements on new development for erosion control, and control of runoff contaminants and direct discharge of water quality pollutants. Construction of projects in the city of San Diego is subject to the erosion control requirements of the City's Grading Ordinance. Projects must also comply with the federal and state Clean Water Act (CWA). Conformance with the CWA is established through compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Permit for the City of San Diego (Municipal Permit), No. R9-2007-0001.

The NPDES Municipal Permit, issued in 2001 to the City of San Diego by the San Diego Regional Water Quality Control Board, requires the development and implementation, to the maximum extent practicable, of storm water pollution BMPs, both during project construction and in the project's permanent design to reduce discharge of pollutants. To address pollutants that may be generated from new development during and post-construction, the Municipal Permit further requires that the City implement a series of construction and permanent BMPs described in the Model Standard Urban Storm Water Mitigation Plan (SUSMP) which is contained in the City's 2008 Storm Water Standards Manual: A Manual for Construction and Permanent Storm Water Best Management Practices Requirements (Storm Water Standards Manual). The City's Storm Water Standards Manual provides information to project applicants on how to comply with all of the City's construction and post-construction permanent storm water BMP requirements, including the SUSMP.

For every project upon formal project submittal, applicants must complete and submit the Storm Water Requirements Applicability Checklist in order to determine the project's storm water BMPs required during construction and post-construction. If the project requires treatment control BMPs, per the Storm Water Applicability Checklist, the applicant must submit a water quality technical report consistent with the City's Storm Water Standards. The report must include, but not be limited to, appropriate BMP selection, BMP maintenance schedules, and the responsible party for future maintenance and associated costs. The report must also address water quality by describing the type of pollutants which would be generated during construction and post-construction, as well as identifying pollutants captured and treated by the proposed BMPs.

## 4.8.2 Significance Determination Thresholds

As stated in the City's 2007 Significance Determination Guidelines for water quality, compliance with federal, state, and local water quality standards is assured through project adherence to the City's Storm Water Standards and conditions placed on building permits prior to project approval. Adherence to the City's Storm Water Standards is considered to preclude water quality impacts unless substantial evidence supports a fair argument that a significant impact would still occur. Project adherence to the City's Storm Water Standards comprises the City's water quality threshold. Thus, impacts related to water quality would be potentially significant if the proposed project would:

- Not adhere to the City's Storm Water Standards.

## 4.8.3 Issue 1: Pollutant Discharge

Would the project proposal result in an increase in pollutant discharge to receiving waters during or following construction? Would the proposal discharge identified pollutants to an already impaired water body?

### 4.8.3.1 Impacts

Water quality is affected by sedimentation caused by erosion, runoff carrying contaminants, and direct discharge of pollutants. The increase of impervious surfaces generally associated with the development of land leads to increased opportunity for contaminated runoff that carries oil, heavy metals, pesticides, fertilizers, and other contaminants to enter a watershed.

As discussed above, runoff generated on-site is conveyed through on-site roads and concrete-lined open ditches to the property boundary, discharged via the outfalls onto the adjacent golf course property and eventually into the receiving waters of the San Diego River approximately 80 feet west of the property. The Lower San Diego River is impaired according to the 2006 State Impaired Water Bodies 303(d) List of Water Quality Limited Segments.

The proposed development has the potential to affect water quality at the project site. Based on the proposed land use, the project as a whole would be expected to generate the following pollutants: sediments, nutrients, heavy metals, organic compounds, trash and debris, oil and grease, oxygen demanding substances, bacteria and viruses, and pesticides. To address water quality concerns associated with these pollutants, BMPs would be implemented during construction and post-construction activities. BMPs to control these general pollutants are described under Issue 2 (Section 4.8.4) below. These measures would reduce impacts to below a level of significant.

### 4.8.3.2 Significance of Impacts

Because the project would implement BMPs to minimize the impacts of construction and post-construction activities on the quality of storm water runoff, water quality impacts would be less than significant.

### 4.8.3.3 Mitigation, Monitoring, and Reporting

With the implementation of the BMPs identified in Section 4.8.4 below, the project would not result in significant impacts to water quality. No mitigation would be required.

## 4.8.4 Issue 2: Water Quality

What short-term and long-term effects would the project have on local and regional water quality? What types of pre- and post-construction Best Management Practices would be incorporated into the project to preclude impacts to local and regional water quality?

### 4.8.4.1 Impacts

The proposed project would incorporate construction of low impact development site design, source control, priority project category, and treatment control BMPs. BMP selection depends on procedures set forth in the City of San Diego's Municipal Code Land Development Manual, 2008 *Storm Water Standards: A Manual for Construction and Permanent Storm Water Best Management Practices Requirements* (Storm Water Standards Manual). In brief, BMPs are selected for their effectiveness in precluding or lessening pollutants and conditions of concern specific to the proposed project and project site.

#### a. Construction BMPs

The main water quality pollutant of concern on the project site during construction activities would be sediment from soil erosion. Erosion control and management of construction activities for the proposed project would be conducted in accordance with the City's Storm Water Standards and applicable state storm water requirements. Construction activities would be required to comply with the State Water Resources Board (SWRCB) NPDES General Permit for Storm Water Discharges Associated with Construction Activity (Permit). Per this Permit, the project would be required to submit a Notice of Intent to the SWRCB and prepare a Storm Water Pollution Prevention Plan (SWPPP) detailing the management of storm water on the construction site. A monitoring and reporting program (MRP) would also be prepared, in accordance with requirements set forth in the Permit. Implementation of the SWPPP and MRP would be subject to inspection and enforcement by the RWQCB.

The construction phase of the Archstone – Mission Gorge project would be monitored by a qualified person (QP) to verify implementation of the WQTR and SWPPP as a condition of development. Monitoring activities would be conducted by a QP with documented training in storm water management, and would include daily forecasting, daily evaluations of conditions during construction activities that are conducted during the wet season (October 1 to April 30), and weekly inspections during the dry season (May 1 to September 30). The QP would evaluate the conditions of the project site with respect to storm water pollution prevention and would represent the owner or contractor on storm water issues. Specific responsibilities of the QP would include:

- Ensuring that BMPs are properly documented and implemented;
- Identifying maintenance and repair needs; and
- Verifying implementation of the WQTR, including erosion and sediment control and waste management requirements.

#### **b. Low Impact Development Site Design BMPs**

The project design incorporates Low Impact Development (LID) Integrated Management Practices (IMPs) where feasible to minimize impervious surface areas and promote infiltration and evaporation of on-site runoff. In order to manage the quantity and quality of storm water runoff, LID practices use site design and specific devices to create a post-development condition that is the same as the hydrologic condition that existed prior to development. The following LID IMPs have been incorporated into the project design wherever feasible:

- Pervious pavement/grasscrete
- Pavers
- Bio-retention
- Detention

Streets and sidewalks within the project site would be constructed to minimum widths necessary. The perimeter access road/fire lane would be constructed of grasscrete and porous pavers to reduce runoff generation.

The LID practice of detention, storing excess runoff for gradual release, would be implemented on-site through the construction of two underground detention basins described under Section 4.9.3.1.b. The proposed rip-rap energy dissipater at the outfall location would additionally serve to reduce discharge velocities and minimize erosion.

Landscaping would be provided between the residential buildings, within the landscaped open space areas, and on all graded slopes to facilitate storm water management. Native- or drought-tolerant landscaping would be used in accordance with City landscape requirements. Roof drains would discharge to landscaping and/or bio-

retention areas where feasible to increase evapotranspiration by plants. Project runoff water quality would be improved through measures such as the detention and biofiltration of on-site runoff and use of grasscrete and other porous surfaces incorporated throughout the project design.

### **c. Source Control BMPs**

Source control BMPs consist of measures to reduce pollutant loads in runoff, particularly for storm events, by reducing the potential for contamination at the source of pollution. Generally, the selected source control BMPs would minimize contact between pollutants and urban runoff. The following source control BMPs are proposed for the Archstone – Mission Gorge project:

- Design of outdoor materials storage to reduce pollution introduction;
- Design of trash storage area to reduce pollution introduction;
- Employment of Integrated Pest Management principles;
- Use of efficient irrigation systems and landscape design; and
- Provision of storm drain inlet stenciling and signage to discourage illegal dumping.

Additional information on the proposed source control BMPs is provided in Appendix K of this EIR.

### **d. Priority Project BMPs**

Based on the City's Storm Water Requirement Applicability Checklist, the proposed project is a priority project and would be required to implement additional BMPs to prevent water quality impacts related to the proposed private roads, residential driveways, guest parking, and surface parking areas. The proposed project would incorporate the following design considerations:

- Private roads would drain to a manufactured treatment device;
- Access road/fire lane would use pervious pavement/grasscrete and pavers to minimize runoff;
- Driveways would drain to treatment BMPs;
- Guest and/or temporary parking would drain to a treatment BMP; and
- The majority of parking would be provided within a covered parking structure.

Additional information on the proposed priority project additional BMPs is provided in the WQTR included as Appendix K of this EIR.

#### **e. Treatment Control BMPs**

Runoff and pollutant loads would be managed by treatment control BMPs. Selected treatment control BMPs target the current pollutants for which the downstream receiving water, the San Diego River, is impaired as well as the anticipated project-generated pollutants. The following storm water treatment control BMPs would be implemented as part of the proposed project design:

- Bio-retention
- Modular Wetlands Hybrid Storm Water Treatment System
- Filterra Storm Water Bio-retention Filtration System
- Contech Storm Filter

Additional information on each treatment control BMP is provided in Appendix K of this EIR. In summary, the selected treatment control BMPs identified above provide some form of filtration of runoff to eliminate or substantially reduce target pollutants.

#### **f. BMPs Maintenance Agreement**

The project applicant would enter into a Storm Water Management and Discharge Control Maintenance Agreement (SWMDCMA) with the City of San Diego to ensure maintenance of permanent BMPs for the Archstone – Mission Gorge project. An Operation and Maintenance Plan would be included in the SWMDCMA. The project applicant would oversee maintenance responsibility for the permanent BMPs; the City of San Diego would not be responsible for maintenance of any permanent BMPs. Inspection would proceed weekly, monthly, quarterly, or annually depending on the particular BMP. Appendix K of this EIR includes the WQTR and recommended maintenance schedule including inspection criteria, maintenance indicators, and maintenance activities for the BMPs that require permanent maintenance.

The following site design and source control BMPs proposed for the Archstone – Mission Gorge project would require permanent maintenance: energy dissipater structure, storm drain stenciling and signage, bioretention and in-ground planter boxes, irrigation systems, trash storage areas, and pavers and grasscrete within the fire lane. The following proposed structural treatment control BMPs would require permanent maintenance: modular wetlands hybrid storm water treatment system, filterra storm water bio-retention filtration system, and the contech storm filter.

#### **4.8.4.2 Significance of Impacts**

The proposed project would comply with all applicable federal, state, and local water quality standards through adherence to the City's Storm Water Standards. Implementation of the proposed BMPs would preclude significant potential impacts to water quality.

#### **4.8.4.3 Mitigation, Monitoring, and Reporting**

With application of the BMPs, water quality impacts would not be significant and no mitigation is required.

## 4.9 Hydrology

The following hydrology analysis is summarized from the approved Preliminary Drainage Study prepared by Rick Engineering in February 2008. The drainage study provides preliminary design of the on-site storm drain system and assessment of impacts to runoff peak flow rates. This technical report is included in its entirety as Appendix L of this EIR.

### 4.9.1 Existing Conditions

#### 4.9.1.1 Receiving Waters

As identified in the Water Quality Control Plan for the San Diego Basin adopted by the California Regional Water Quality Control Board (RWQCB) in 1994, the proposed project site is located within the Mission San Diego Hydrologic Subarea (HSA), Basin Number 907.11, of the Lower San Diego Hydrologic Area and San Diego Hydrological Unit. The Mission San Diego HSA encompasses an approximately 440-square-mile watershed which includes the surface waters of the San Diego River, Lake Murray, and Alvarado, Murphy, Shepard, and Murray Canyons. The San Diego River is the largest receiving water body in the Mission San Diego HSA, and occurs both upstream and downstream of the project site. At its closest point, the San Diego River is located approximately 80 feet due west of the western boundary of the project site. Coastal receiving waters in the Mission San Diego HSA include the mouth of the San Diego River, located approximately nine miles west of the project site.

#### 4.9.1.2 Drainage Patterns

The 100-year floodplain of the San Diego River extends onto the western edge of the project site, covering approximately 2.26 acres of the 10.22-acre site, as shown on panels 1636 and 1637 of the Federal Emergency Management Agency's (FEMA) Federal Insurance Rate Maps (refer to Figure 2-4 in Section 2.0 of this EIR).

Under existing conditions, no tributary runoff from off-site areas drains through the project site. The total drainage tributary area of the project site is thus equivalent to its total area, or approximately 10.22 acres. Previous grading for development of the existing mobile home park has resulted in a two-level terraced topography, with six major drainage basins, each with its own outfall. Four of the six existing outfalls occur along the west property boundary and two occur along the north property boundary. Currently, runoff generated on-site is conveyed through on-site roads and concrete-lined open ditches to the property boundary, then discharged via the outfalls onto the adjacent golf course property and eventually into the receiving waters of the San Diego River.

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## 4.9.2 Significance Determination Thresholds

Based on the City's significance thresholds, impacts related to hydrology would be significant if the proposed project would:

- Result in an increase in impervious surfaces and associated increased runoff.
- Result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes.
- Develop wholly or partially within the 100-year floodplain identified in the FEMA maps or impose flood hazards on other properties.

### 4.9.3 Issue 1: Runoff

Would the proposed project result in an increase in impervious surfaces and associated increased runoff?

#### 4.9.3.1 Impacts

Typically, as land is developed, impervious area is increased thereby increasing runoff. Implementation of the proposed project would increase the amount of impervious surfaces tributary to the project site and would increase peak runoff discharge rates, but not by substantial margins. Under post-project conditions, the project site tributary drainage area would increase by 0.41 acre due to off-site widening and intersection improvements at Mission Gorge Road and Greenbrier Avenue. Runoff flows from a portion of Mission Gorge Road would be intercepted and detained within the project site along with projected on-site flows.

Table 4.9-1 below provides a comparison of pre- and post-project runoff coefficients. A lower number reflects more pervious conditions. For the mobile home park pre-project condition, a weighted runoff coefficient was calculated to range from 0.72 to 0.78 for most of the site. This compares to runoff coefficients of 0.73 (for the proposed buildings and courtyards), 0.45 (for the project landscaping), and 0.95 (for the proposed parking lot) for the post-project condition.

**TABLE 4.9-1  
RUNOFF COEFFICIENTS**

	Pre-project	Post-project
Runoff Coefficients	C=0.72 to 0.78 (Weighted Runoff Coefficient) C=0.95 (Paved Area)	C=0.45 (Landscaping) C=0.73 (Buildings and Courtyards) C=0.95 (Paved Area)
Land Use	Mobile Home Park	Multi-family Residential

SOURCE: Preliminary Drainage Study for Archstone Mission Gorge, Rick Engineering, February 6, 2008.

The proposed engineered drainage system would manage, detain, and attenuate project runoff flows to pre-project rates prior to discharge from the property as shown in Table 4.9-2 below. Table 4.9-2 provides a summary of the pre-project and detained post-project peak flows for the project site, based on the each condition's tributary drainage area size and runoff coefficients.

**TABLE 4.9-2  
SUMMARY OF PRE-PROJECT AND DETAINED POST-PROJECT PEAK FLOWS**

6-Hour Storm Event (Year)	Pre-project Peak Flow (cfs)	Post-project Detained Peak Flow (cfs)
2	10.0	N/A
10	14.31	N/A
100	19.31	19.1

SOURCE: Preliminary Drainage Study for Archstone Mission Gorge, Rick Engineering, February 6, 2008.

As described below in Section 4.9.4, Issue 2: Drainage Patterns, the proposed project runoff flows would be detained and attenuated to pre-project rates prior to discharge from the project site. Environmental effects associated with the projected increases in impervious surfaces and associated increased runoff would therefore not be significant.

#### **4.9.3.2 Significance of Impacts**

The proposed project would redevelop the site and result in a slight increase in impervious surfaces compared to existing conditions. Drainage improvements proposed as part of the project (described below) would ensure that runoff from the impervious surfaces would not result in significant impacts.

#### **4.9.3.3 Mitigation, Monitoring, and Reporting**

Runoff impacts would not be significant and no mitigation would be required.

### **4.9.4 Issue 2: Drainage Patterns**

Would the proposed project result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

#### **4.9.4.1 Impacts**

##### **a. Floodplain Alteration**

The proposed project would place fill within the 100-year floodplain of the San Diego River to raise the elevation out of the floodplain. The lowest floor of the proposed residential structures in this location and throughout the project site would be a minimum of two feet above the base flood elevation.

As described below, the proposed project includes an underground storm drain system, with on-site detention, two outlets, and energy dissipater. This system would ensure that post-project flow will be detained to a pre-project flow rate and would reduce the impact to downstream properties. Thus, the placement of fill within the floodplain would not alter the flow or flood potential of the San Diego River.

## **b. Drainage Patterns**

Under existing conditions, project site runoff is collected within six on-site drainage basins and then discharged to the adjacent golf course and San Diego River floodplain via six outfalls located along the north and west property boundary. The proposed project would alter the pattern of on-site drainage collection and discharge through construction of an underground storm drain conveyance system, two underground detention basins, and two discharge outfalls at one location on the west boundary of the property. Riprap protection would be provided at the outfall location in order to reduce flow velocities. The post-project condition would result in two major drainage basins instead of the six under pre-project conditions.

### ***Storm Drains***

Project development would include construction of an underground storm drain conveyance system with two outlets, through which project runoff would be discharged to the adjacent golf course property and receiving waters of the San Diego River. Runoff from rooftops would be collected in downspouts, while runoff from roadways and parking areas would be collected in grate or curb inlets. Grate and curb inlets would also intercept flows from pervious pavement and natural areas surrounding paved areas. Runoff would be collected from the two major project drainage basins and directed to underground storm drains within the north, south, and west perimeter fire lane, then ultimately west to the two outfalls. The runoff would then be conveyed in storm drain pipes to the outlet locations and eventually discharged to the San Diego River along the northwest side of the property. As discussed in the Water Quality Section 4.8 of this EIR, low impact development site design, combined with source and treatment control BMPs, would ensure that the water quality of project runoff and ultimate discharge to the San Diego River would be high and serve to clean up and restore the hydrologic function of the San Diego River.

### ***Detention Basins***

Prior to being discharged at the two outfalls, runoff would be detained within two underground detention basins on-site until attenuated to match pre-project flow volumes and flow velocities. The proposed underground detention basins would consist of two 72-inch pipes, one 185 feet and the other 230 feet in length. These underground detention basins (or large pipes) would detain project runoff from the two drainage

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basins prior to discharge into the outfalls in order to discharge a combined 100-year flow rate that would match the pre-project flow rate.

### ***Outfalls***

Two outfalls would be located at a single outlet point at the approximate mid-point of the west property boundary. This location is roughly the same as that of an existing outfall. Proposed storm drain pipes at the outfall would be two 24-inch pipes designed to convey the post-project 100-year, 6-hour peak runoff discharge.

### ***Energy Dissipater***

Project design includes construction of riprap slope protection at the location of the two outlets of the storm drains. These project improvements would consist of quarter-ton rock with a thickness of 2.7 feet and would serve as an energy dissipater to reduce the flow velocities at the storm drain discharge locations.

Given the improvements described above, there would be no increase in flooding on- or off-site. Project runoff would be detained on-site and attenuated to the pre-project flow rate and volumes prior to being discharged to the westerly outfall. Thus, the project would not result in significant impacts to drainage patterns.

### **4.9.4.2 Significance of Impacts**

The proposed project would not change the overall drainage pattern existing on the project site or cause significant impacts on-site or to upstream or downstream properties.

### **4.9.4.3 Mitigation, Monitoring, and Reporting**

No significant drainage impacts are anticipated and no mitigation would be required.

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## 4.10 Visual Effects and Neighborhood Character

This section addresses the compatibility of proposed land uses with existing and planned surrounding development and neighborhood character.

### 4.10.1 Existing Conditions

#### 4.10.1.1 Existing Visual Landscape

##### a. Landform

The project site is currently developed as a mobile home park. Its existing graded landform is characterized by a terraced topography, ranging in elevation of approximately 114 feet above mean seal level (AMSL) on the upper easterly portion to 81 feet AMSL on the lower westerly portion of the project site. Both the upper and lower portions of the project site are paved, leveled, and occupied by mobile homes. The upper and lower portions of the project site are separated by an approximate 2:1 (horizontal:vertical) manufactured slope with an internal street within the sloped area descending to the lower portion of the mobile home park. The lower portion of the mobile home park lies within the 100-year floodplain of the San Diego River (as shown in Figure 2-4, Section 2.0) and is at grade with the adjacent Admiral Baker Golf Course. The upper portion is roughly at grade with Mission Gorge Road.

Prominent landform features in the project vicinity include the steep cliffs of the San Diego River gorge (i.e., Mission Gorge) located one-quarter mile northwest of the project site, west of Mission Gorge Road and the San Diego River. The river gorge is the site of the early Mission Dam and is a State Historical Landmark. Mission Trails Regional Park located approximately four miles northeast of the project site contains another prominent landform, Cowles Mountain. At its peak of 1,591 feet AMSL, Cowles Mountain is the highest point in the city.

##### b. On-site and Surrounding Development

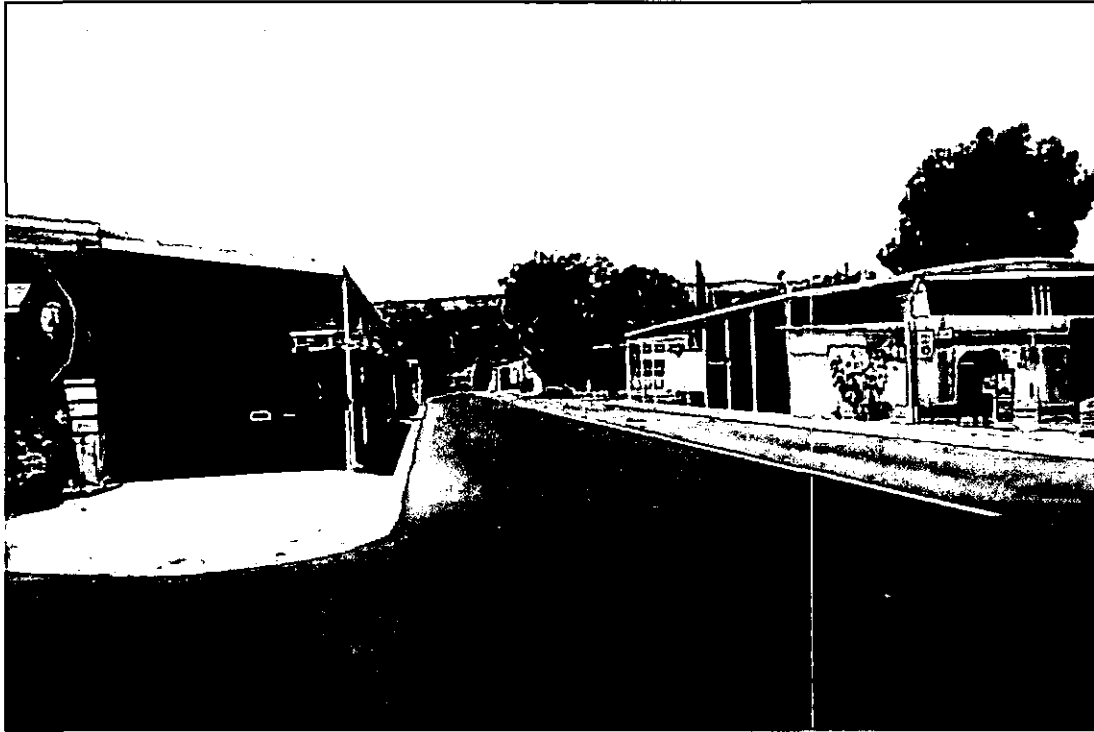
The project site is currently developed as a mobile home park. Figure 4.10-1 provides a photograph key to the six photographs taken on-site and included as Figures 4.10-2 through 4.10-4. Figure 4.10-2 shows two photographs of the mobile home park taken at the northeast corner of the property, just inside the park entrance. Figure 4.10-3 shows two photographs taken from the southeast corner of the mobile home park looking north and west. Figure 4.10-4 shows two views from the southwest corner of the mobile home park. The top view in Figure 4.10-4 additionally shows the existing three-story apartment building that lies south and adjacent to the mobile home park. As shown in these photographs, existing on-site mobile homes are one-story and moderately well-

Photo Survey

*Site Key Map*



FIGURE 4.10-1  
Existing Site Photographs Key Map



1) View looking west into the project site from the entrance at the northeast corner of the site.

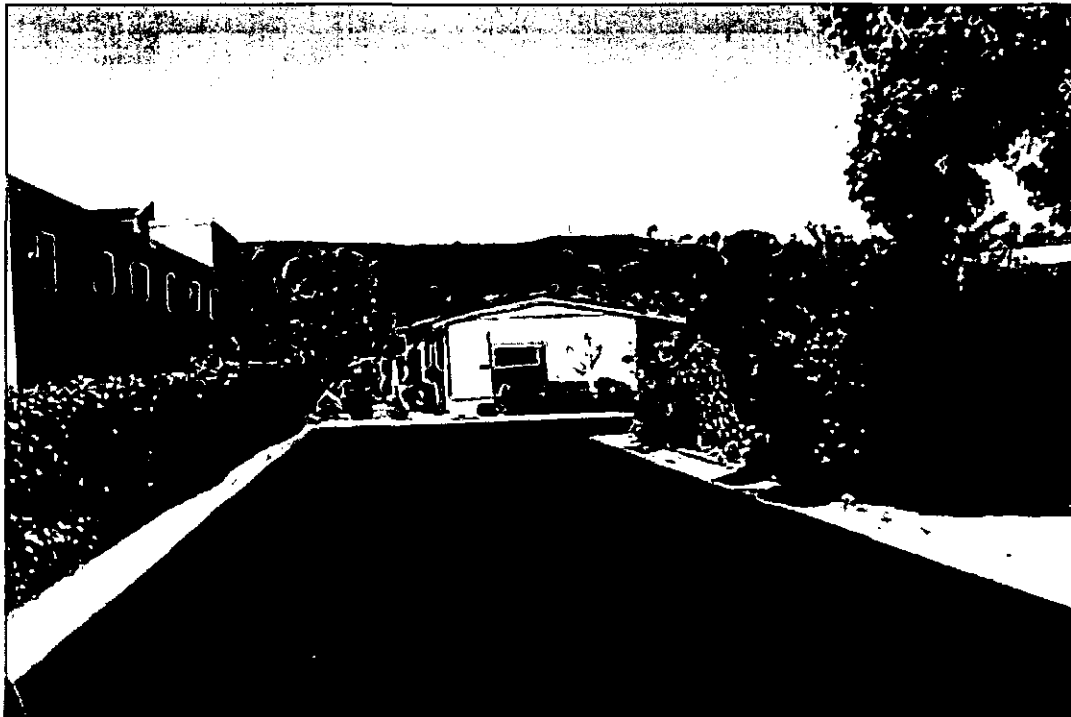


2) View looking southwest into the project site from the entrance at the northeast corner of the site.

FIGURE 4.10-2  
Existing Site Photographs  
Looking from the Northeast Corner



3) View looking northeast into the project site from the southeast corner of the site.



4) View looking west into the project site from the southeast corner of the site.

FIGURE 4.10-3  
Existing Site Photographs  
Looking from the Southeast Corner

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5) View looking east into the project site from the southwest corner of the site.



6) View looking north into the project site from the southwest corner of the site.

FIGURE 4.10-4  
Existing Site Photographs  
Looking from the Southwest Corner

maintained despite several being older than a decade. The mobile home park streets and public facilities are likewise clean and well-maintained.

Existing land uses within and surrounding the project site are shown in Figure 2-5 (refer to Section 2.0). The project site is currently developed as a mobile home park and surrounded by light industrial developments and a sand and gravel mining operation to the north; the six-lane 132-foot-wide Mission Gorge Road to the east; single-family residential development further to the east, across Mission Gorge Road; multi-family residential and commercial uses to the south; and the Navy's Admiral Baker Golf Course and San Diego River open space to the west. The City's largest resource-based park, the Mission Trails Regional Park, occupies 6,200 acres roughly four miles northeast of the project site. The park includes both passive and active uses.

The NCP land use designations which border the project site, generally reflect existing development and include Open Space to the west, Industrial to the north, Single-Family Residential to the east, and Multi-Family Residential to the south (refer to Figure 2-8 in Section 2.0 of this EIR). The more recent General Plan (adopted March 10, 2008) also designates the project site and area to the south and east for Residential use (refer to Figure 2-6 in Section 2.0), but identifies the project site and area immediately to its south, west of Mission Gorge Road, as having higher propensity (than the Residential areas to the east) for development in village-type uses, pursuant to the City of Villages strategy (refer to Figure 2-7). The City of Villages strategy, as described in Sections 2.6 and 4.1 of this EIR, aims to encourage new development into infill sites within already developed areas of the city that maximizes development potential, uses available public infrastructure, and supports nearby existing and planned transit uses.

As described in Sections 2.7 and 7.0 of this EIR, development proposals for two properties north of the project site are in the early planning stage, but generally envision medium- to high-density residential and commercial-employment uses. Future plans for the property immediately north of the project site (the Garver-Bradley property) include high-density residential uses which would replace existing industrial storage uses. The property further to the north (the Superior Ready Mix property) is proposed for medium- and high-density residential and commercial uses, which would occur in phases as mining operations are ceased and the areas reclaimed.

### **c. Neighborhood Character**

In terms of neighborhood character, the project site lies adjacent to an existing three-story multi-family apartment complex on the south whose architectural style can be characterized as modern geometric. Low-profile industrial storage uses and scattered buildings characterize the area north of the project site. With uses such as new vehicle storage, wrecked vehicle storage, boat storage, and rental car storage, interwoven with meandering dirt roads, the area north of and adjacent to the project site appears visually cluttered. Further to the north, west of Mission Gorge Road, lies the Superior Ready Mix

sand and gravel mining operation. Mining of this 395-acre site has generally occurred from west to east, and the areas mined earlier have been reclaimed, appearing as undeveloped, graded pads with some vegetation cover. Large scraped areas denuded of vegetation characterize the active mining area, with mining vehicles and resource-processing equipment creating visual movement and audible noise. Minimal landscaping occurs along this area's Mission Gorge Road frontage, and no landscaping or other visual screening occurs within these industrial properties.

The Navajo Community Plan describes the character of the area along Mission Gorge Road as one of "visual clutter created by numerous curb cuts, unscreened parking areas, excessive sign and billboards, and aboveground utilities" that, along with "the condition of much of the development along Mission Gorge Road, does not project a positive impression of the community" (Navajo Community Plan, p. 26).

One- and two-story single-family homes occupy much of the Allied Gardens neighborhood located across Mission Gorge Road (refer to Figure 2-5) to the east of the project site. These homes are separated from the project site by more than 140 feet at their closest (and thus are not considered to be *adjacent* to the project site). As identified in the City's General Plan, the neighborhoods within the Navajo community comprise one of several post-World War II suburban communities, whose single-family housing tracts "were often developed much more quickly than the earlier communities, and with less opportunity for organic growth and infill they retain essentially the same residential structures that were part of the original development" (General Plan, Land Use Element). The Navajo Community Plan adds that the "neighborhood centers along Mission Gorge Road have been developed without regard to other development, resulting in a lack of coordinated design" (Navajo Community Plan, p. 26).

Thus, an objective of the Community Plan is to improve the appearance along Mission Gorge Road by reducing signs, improving landscaping and architectural design, providing consistent building setbacks, and providing adequate off-street parking. For the residential properties abutting Mission Gorge Road between Old Cliffs Road and Zion Avenue, the Navajo Community Plan (and Municipal Code zoning) overlays a CPIOZ. As described in Sections 2.6.2.3 and 4.1 of this EIR, the purpose of the CPIOZ is to provide supplemental development regulations tailored specifically to these properties to ensure that development proposals incorporate quality site design. (See Section 4.10.1.2 below for further detail.)

The Admiral Baker Golf Course west of the project site straddles the San Diego River and is visually characterized by ornamental (golf course) landscaping (trees and lawn), interspersed with native and non-native riparian vegetation and open water ponds. Further to the west, the broad river valley narrows and rises up into the steep bluffs of the Mission Gorge river gorge. The Master Plan for the planned San Diego River Park characterizes land uses within the river corridor as being "disconnected from the river and failing to view the river as a focus of the communities that it flows through" (San

Diego River Park Master Plan, p. 7). To improve the visual character of the river corridor, as well as to improve water quality, habitat, and recreational opportunities, the Master Plan envisions the creation of a river-long park, stretching from the San Diego River headwaters in Julian west to Ocean Beach, with adjacent uses focusing on and augmenting the attributes of the river. (Refer to Section 2.6.3 of this EIR for a more detailed description of the San Diego River Park Master Plan, including its recommendations for the area adjacent to the project site.)

#### **4.10.1.2 Applicable Policies and Regulations**

Several existing policies and development regulations provide pertinent visual quality and neighborhood character criteria for development in the Navajo Community Plan area. The adopted General Plan and Navajo Community Plan contain aesthetics provisions, as do the land use adjacency guidelines of the San Diego MSCP Subarea Plan, and the height, bulk, and scale requirements of the City's Land Development Code.

##### **a. General Plan**

In its Urban Design Element, the General Plan includes goals and policies that emphasize the integration of compatible land uses, the creation of transit-focused, walkable villages, the provision of high-quality public spaces and civic architecture, as well as the enhancement of the visual quality of all types of development. In its introduction, the Urban Design Element advises "as the availability of vacant land becomes more limited, designing infill development and redevelopment that builds upon our existing communities becomes increasingly important. A compact, efficient, and environmentally sensitive pattern of development becomes increasingly important as the City continues to grow. In addition, future development should accommodate and support existing and planned transit service" (General Plan, Urban Design Element). The Urban Design Element policies relevant to the design of the proposed project are included below.

##### ***Open Space Linkages***

**UD-A.2.** Use open space and landscape to define and link communities.

- a. Link villages, public attractions, canyons, open space and other destinations together by connecting them with trail systems, bikeways, landscaped boulevards, street trees, formalized parks, and/or natural open space, as appropriate.
- b. Preserve and encourage preservation of physical connectivity and access to open space.

***Development Adjacent to Natural Features and Park Lands***

**UD-A.3.** Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.

- e. Utilize a clustered development pattern, single-story structures or single-story roof elements, or roofs sloped toward the open space system or natural features, to ensure that the visibility of new developments from natural features and open space areas are minimized.
- g. Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features.
- j. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way.
- k. Encourage location of entrances and windows in development adjacent to open space to overlook the natural features.
- l. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas.

***Architecture***

**UD-A.5.** Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.

- a. Relate architecture to San Diego's unique climate and topography.
- b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials proximate to commercial areas and residential neighborhoods that have a well-established, distinctive character.
- c. Provide architectural features that establish and define a building's appeal and enhance the neighborhood character.
- d. Encourage the use of materials and finishes that reinforce a sense of quality and permanence.
- f. Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs and recessed doorways are used to provide visual interest at the pedestrian level.

- g. Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street.
- j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.

**UD-A.6.** Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.

- c. Ensure that building entries are prominent, visible, and well-located.
- e. Minimize the visual impact of garages, parking, and parking portals to the pedestrian and street façades.

### ***Landscape***

**UD-A.8.** Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.

- a. Maximize the planting of new trees, street trees and other plants for their shading, air quality and livability benefits.
- b. Encourage water conservation through the use of drought tolerant landscape.
- c. Use landscape, especially revegetation, to support storm water management goals and Best Management Practices (BMPs) for filtration, percolation, and erosion control.
- d. Use landscape to provide unique identities within neighborhoods, villages.
- g. Unify communities by using street trees to link residential areas.
- h. Provide “shade over pavement” in concrete areas, especially parking areas (vehicular use areas).
- k. Consider landscaped areas as useable and functional amenities for people activities.
- m. Utilize “transitional landscaping” (landscape adjacent to natural features) to soften the visual appearance of a development and provide a natural buffer between the development and open space areas.

### ***Transit Integration***

**UD-A.9.** Incorporate existing and proposed transit stops or stations into project design.

- d. Locate buildings along transit corridors to allow convenient and direct access to transit

### ***Structured Parking***

**UD-A.11.** Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking.

- b. Design safe, functional, and aesthetically pleasing parking structures.
- c. Design structures to be of a height and mass that are compatible with the surrounding area.
- d. Use building materials, detailing and landscape that complement the surrounding neighborhood.
- e. Provide well-defined, dedicated pedestrian entrances.
- f. Use appropriate screening mechanisms to screen views of parked vehicles from pedestrian areas, and headlights from adjacent buildings.
- g. Pursue development of parking structures that are wrapped on their exterior with other uses to conceal the parking structure and create an active streetscape.

### ***Surface Parking***

**UD-A.12** Reduce the amount and visual impact of surface parking lots.

- i. Use trees, shade structures, and other landscape to provide shade, and screening and filtering of storm water runoff, in parking lots including roof-level parking areas.

### ***Lighting***

**UD-A.13.** Provide lighting from a variety of sources at appropriate intensities and qualities for safety.

- a. Provide pedestrian-scaled lighting for pedestrian circulation and visibility.
- b. Use effective lighting for vehicular traffic while not overwhelming the quality of pedestrian lighting.
- c. Use lighting to convey a sense of safety while minimizing glare and contrast.
- d. Use vandal-resistant light fixtures that complement the neighborhood and character.

- e. Focus lighting to eliminate spill-over so that lighting is directed, and only the intended use is illuminated.

**UD-A.16.** Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.

- a. Convert overhead utility wires and poles, and associated overhead structures for supplying electric, communication, community antenna television, or similar service to underground.

### ***Safety and Security***

**UD-A.17.** Incorporate Crime Prevention Through Environmental Design (CPTED) measures, as necessary, to reduce incidences of fear and crime, and design safer environments.

### ***Residential Design***

**UD-B.1.** Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.

- a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development.
- b. Design new construction to respect the pedestrian orientation of neighborhoods.
- c. Provide innovative designs for a variety of housing types to meet the needs of the population.

### ***Residential Street Frontages***

**UD-B.4.** Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.

- a. Locate buildings on the site so that they reinforce street frontages.
- b. Relate buildings to existing and planned adjacent uses.

- e. Locate transparent features such as porches, stoops, balconies, and windows facing the street to promote a sense of community.
- f. Encourage side- and rear-loaded garages. Where not possible, reduce the prominence of the garage through architectural features and varying planes.
- g. Minimize the number of curb-cuts along residential streets.

### ***Open Space and Recreation***

**UD-B.8.** Provide useable open space for play, recreation, and social or cultural activities in multifamily as well as single-family projects.

- a. Design attractive recreational facilities, common facilities, and open space that can be easily accessed by everyone in the development it serves.
- b. Design outdoor space as “outdoor rooms” and avoid undifferentiated, empty spaces.

### **b. Navajo Community Plan**

The Navajo Community Plan includes objectives and proposals to ensure quality site design that are largely consistent with the 2008 General Plan Urban Design Element. However, in some cases the General Plan policies comprise design criteria more attuned to compact, infill development.

### ***Residential/Apartment Development***

Relative to multi-family residential and/or apartment developments, the Navajo Community Plan includes the following proposals:

#### ***Site Design***

- Apartment developments should be arranged in such a way as to harmonize with adjacent single-family developments. They should be designed to present less apparent bulk and to minimize the clash of scale and activity between apartments and houses.
- Variety in apartment design should be facilitated by introducing optional rear and side setbacks and a front yard requirements based on FAR rather than absolute dimension. Variable front yard spaces can give an interesting character to the street. To assure adequate outdoor space for residents, a minimum percentage of the floor space could be in the form of balconies and landscaped roof terraces.

***Residential Street Design***

- Streets should be designed and developed to be pleasant places to walk as well as drive. The arrangement of houses should create a pleasant streetscape. Alignment, paving, and landscaping and tree planting should all be designed to enhance visual effect.
- Dwellings along streets with heavy traffic should, where possible, have the main orientation of their living space and access away from the traffic. In some cases, further measures such as soundproofing maybe required.
- Underground all utilities.
- Provide the maximum street tree planting. Trees should be placed close enough together to create an effect of enclosure and to provide protection of trees from hot drying winds and sun scald.

***Community Plan Implementation Overlay Zone (CPIOZ)***

In addition to the residential site and street design proposals described above, the proposed project is subject to the supplemental development criteria of the CPIOZ. The CPIOZ contains specific issues to be addressed for new residential development abutting Mission Gorge Road between Old Cliffs Road and Zion Avenue. These include the following, relevant to the project site:

**Architectural Design.** New development shall be compatible in design with the existing neighborhood. The bulk and scale of new buildings should be similar to the surrounding buildings.

**Building Setback Adjacent to Mission Gorge Road.** All structures on Mission Gorge Road shall observe a minimum 10-foot setback. Structures over 30 feet in height shall be set back or stepped back an additional one foot for each foot of building height over 30 feet.

**Landscaping.** An extensively landscaped street yard shall be provided for any new residential development along Mission Gorge Road. In addition, landscaping should be used to soften the appearance of perimeter walls and residential structures from Mission Gorge Road and from adjacent uses. Landscaping shall be provided as required by the City of San Diego's Land Development Code, Landscape Regulations and the Land Development Manual, Landscape Standards.

**Parking.** Parking areas shall be well-screened from Mission Gorge Road using a combination of landscaped berms, tall trees, and shrubs. Tree plantings shall be incorporated throughout the parking area.

**Streetscape Improvements.** New development shall be required to provide sidewalks and undergrounding of utilities on-site and construction of a median along the Mission Gorge Road frontage. The feasibility of landscaping the median in Mission Gorge Road should be studied. Landscaping and paving in the median should continue the pattern established in the existing median on Mission Gorge Road. On Mission Gorge Road, north of Friars Road, curb cuts shall be in conformance with the Street Design Manual standards for primary arterials.

**Building Setback Adjacent to the River.** All structures within 150 feet of the San Diego River's 100-year floodway shall be designed to step back away from the floodway so that low-story buildings are adjacent to the river, with the higher stories tiered away from the river. Buildings shall be setback or stepped back from the floodway at a ratio of one foot for each foot of building height with a minimum setback of 20 feet.

**Pedestrian Access.** A continuous 10-foot minimum width pedestrian/bicycle path shall be provided along the river frontage within the 20-foot minimum setback. All structures within 150 feet of the river floodway shall provide at least one pedestrian entrance from the structure to the river path.

Design walkways and parking facilities to minimize danger to pedestrians. Pedestrian walkways should be sharply separated from traffic areas and set apart where possible to provide a separate circulation system.

**Building Reflectivity.** No more than 30 percent of any single elevation of a building's exterior may be constructed of a material with a light reflectivity factor greater than 25 percent.

**Refuse Collection/Outdoor Storage.** Refuse collection and outdoor storage areas shall be located in interior side yards only, except that no outdoor storage area shall be located between the building wall line and the San Diego River. Refuse collection and outdoor storage areas shall be screened with a solid six-foot fence or wall or an enclosed structure. All such fences or structures shall be of a similar material and color as the main building.

### **c. Land Development Code**

As described in detail in Section 2.6.5 of this EIR, the City's Municipal Code Chapters 11 through 14 contain numerous provisions to guide the design of development throughout the City and are referred to as the Land Development Code. Through specified maximum building heights, maximum lot coverage and floor area ratios, and front, rear and side yard setback requirements for base and overlay zones, the LDC provides restrictions on land development and design. In addition, the LDC provides development design requirements specifically restricting the design of signage, fencing, outdoor storage, lighting, and more. For example, in its Outdoor Lighting Regulations (LDC,

Section 142.0740), exterior lighting requirements such as the installation of timers or motion-sensors, shields or diffusers, directional lighting, and limits on illumination, serve to avoid light and glare effects on adjacent uses.

#### **d. Multiple Species Conservation Program Subarea Plan**

##### ***Land Use Adjacency Guidelines***

As identified in Section 2.6.6 of this EIR, the project site lies adjacent to the City's MHPA associated with the San Diego River and is thus subject to the MSCP Subarea Plan's Land Use Adjacency Guidelines. The adjacency guidelines include drainage and runoff, lighting, noise, landscaping, fencing, and slope grading recommendations to be incorporated into the project design for uses adjacent to the MHPA. These measures are addressed in further detail in the Land Use and Biology sections of this EIR, Sections 4.1 and 4.7, respectively.

### **4.10.2 Significance Determination Thresholds**

Pursuant to the Visual Effects and Neighborhood Character chapter of the City's 2007 CEQA *Significance Determination Thresholds*, a proposed project would have a significant impact on visual quality and neighborhood character if any one or more of the following would occur as a result of the proposed project:

1. The blocking of public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas (Pacific Ocean, downtown skyline, mountains, canyon, waterways);
2. The creation of a negative visual appearance as a result of any of the following: (a) a creation of a disorganized appearance that would substantially conflict with City codes; (b) a significant conflict with the height, bulk, or coverage regulations of the zone that does not provide architectural interest; (c) the construction of crib, retaining, or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public; (d) the creation of an exceedingly monotonous visual environment (e.g., a large subdivision in which all the units are virtually identical); or (e) the creation of a shoreline protection device in a scenic, high public use area;
3. A stark contrast to adjacent development, either in architectural style or building materials, where the adjacent development follows a single or common architectural theme;
4. A significant alteration of the natural landform; or
5. The emission or reflection of a significant amount of light and glare.

### 4.10.3 Issue 1: Public Views

Would the proposed project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the Navajo Community Plan?

#### 4.10.3.1 Impacts

The City's 2007 Significance Determination Thresholds provides an expansion of the above public views significance thresholds in order to more accurately evaluate significance potential. Accordingly, a significant impact to public views could result if a proposed project would block public views from designated open space areas, public roads, or parks or to significant visual landmarks or scenic vistas, and one or more of the following conditions apply: (a) the project would substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program; (b) the project would cause a substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan; (c) the project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area; and (d) the project would have a cumulative effect by opening up a new area for development which would ultimately cause extensive view blockage. Views from private property are not considered by CEQA or protected by the City of San Diego.

The Navajo Community Plan does not designate any public view corridors, public viewing areas, or scenic vistas within the plan area. However, it does identify Mission Trails Regional Park and the San Diego River gorge as significant community resources, and views to or from the park or river gorge could be considered a valuable scenic resource. The General Plan also does not specifically identify scenic resources or significant public viewing areas within the Navajo Community Plan area, but does consider views of or from public open space, open water, or other prominent landforms to be potentially significant.

Portions of the San Diego River corridor, the upper bluffs of the river gorge, and Mission Trails Regional Park include scenic resources with direct line-of-sight to the project site. However, given distance and elevational perspective, views from the high bluffs overlooking the river gorge, and from the higher trails within Mission Trails Regional Park, would not be substantially altered. From their distant, bird's-eye perspective, viewers from these locations would continue to see rooftop and paved driveway patterns and colors typical of urban development and similar to existing views of the mobile home park.

As described above in Section 4.10.1, the existing mobile home park landform is terraced, with an approximate differential of 30 feet elevation between the higher eastern

terrace and the lower, western terrace. The western terrace is roughly at grade with the San Diego River, and the eastern portion is at grade with Mission Gorge Road and residential uses to the east of Mission Gorge Road. Further east of Mission Gorge Road the land slopes upward, affording residents and motorists on Greenbrier Avenue an oblique view of the project site.

### **a. Photographic Simulations**

Figure 4.10-5 provides a key map to the locations of five photographic simulations depicting before and after project site conditions. The before images consist of unaltered photographs, and the after images consist of the same photographs incorporated into the background of computer-generated simulations of the proposed project derived from technical drawings.

#### ***View from Greenbrier Avenue***

Figure 4.10-6 provides before and after views from Greenbrier Avenue at Mission Gorge Road looking west toward the project site. As evidenced in the before image, residents and motorists on Greenbrier Avenue have a direct line-of-sight to the east edge of the project site. Current views of the project site are dominated by a masonry wall and tall shrubbery that obscure views further into the site. Some mobile homes are visible where the shrubbery is sparse or absent. The San Diego River is not visible from this location.

As the post-project photosimulation shows, implementation of the proposed project would not substantially alter the visibility of the San Diego River corridor from Greenbrier Avenue, given that the river is currently obscured from view, but would create taller intervening structures by replacing the single-story mobile homes with two-, three- and four-story rental condominiums. Project implementation would, however, provide potential east-west view corridors into the project site through incorporation of several landscaped ground-level courtyards (refer to Figure 3-10 of the Project Description). Also, as illustrated in the post-project photosimulation, the design of the primary project entry includes landscaping, a water feature, and other aesthetic elements that would enhance views of the project site.

#### ***Views from Mission Gorge Road***

Figures 4.10-7 and 4.10-8 provide before and after views from both the southbound and northbound lanes of Mission Gorge Road. As evidenced in the before images, public views toward the river from Mission Gorge Road are presently largely obscured due to vegetation, existing mobile homes and accessory structures, and the elevational difference between the road and river. High travel speeds along Mission Gorge Road, a primary arterial, also make glimpses of the river corridor difficult. As the post-project photosimulations show, implementation of the proposed project would not substantially

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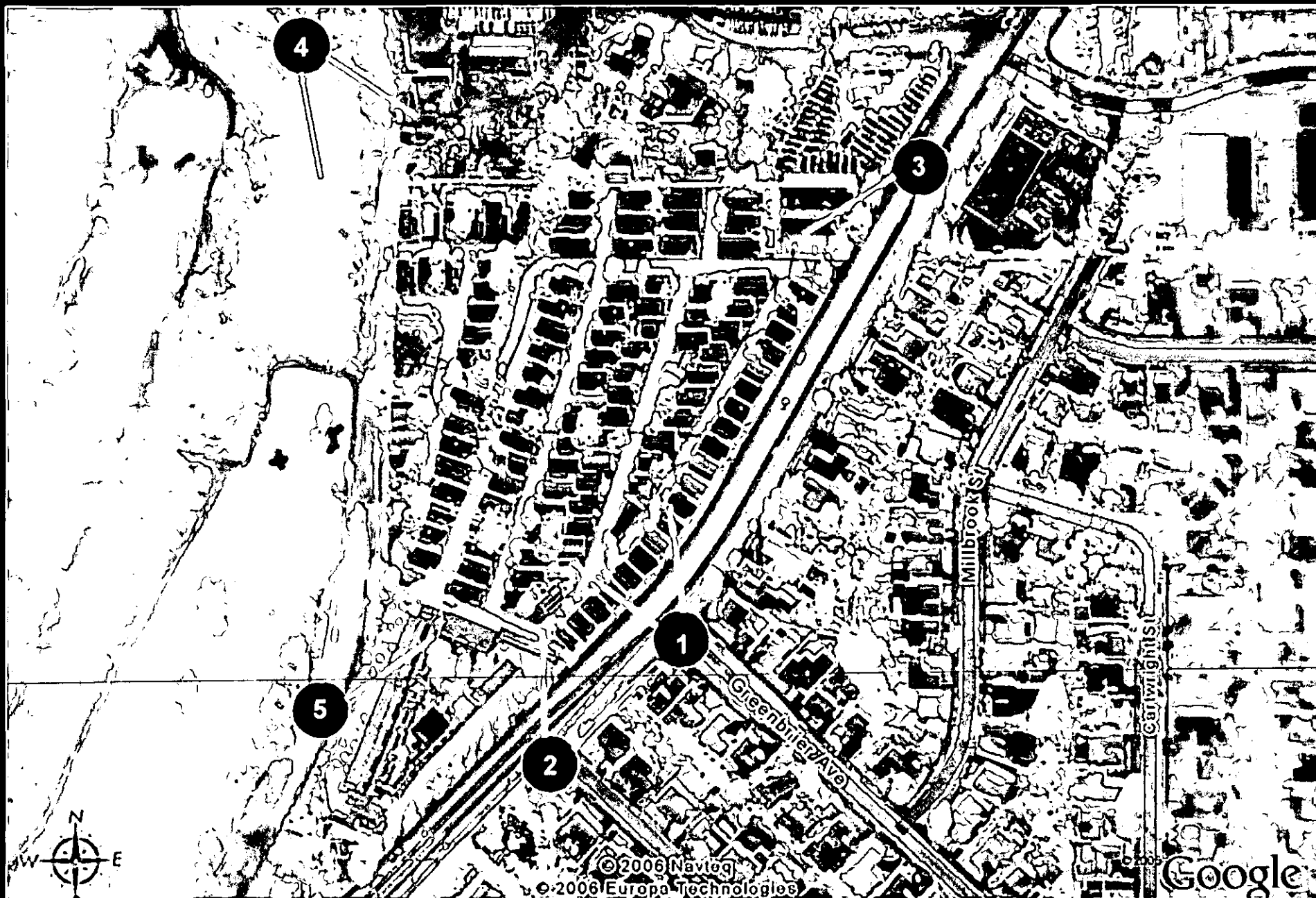


FIGURE 4.10-5  
Photosimulations Key Map



Before



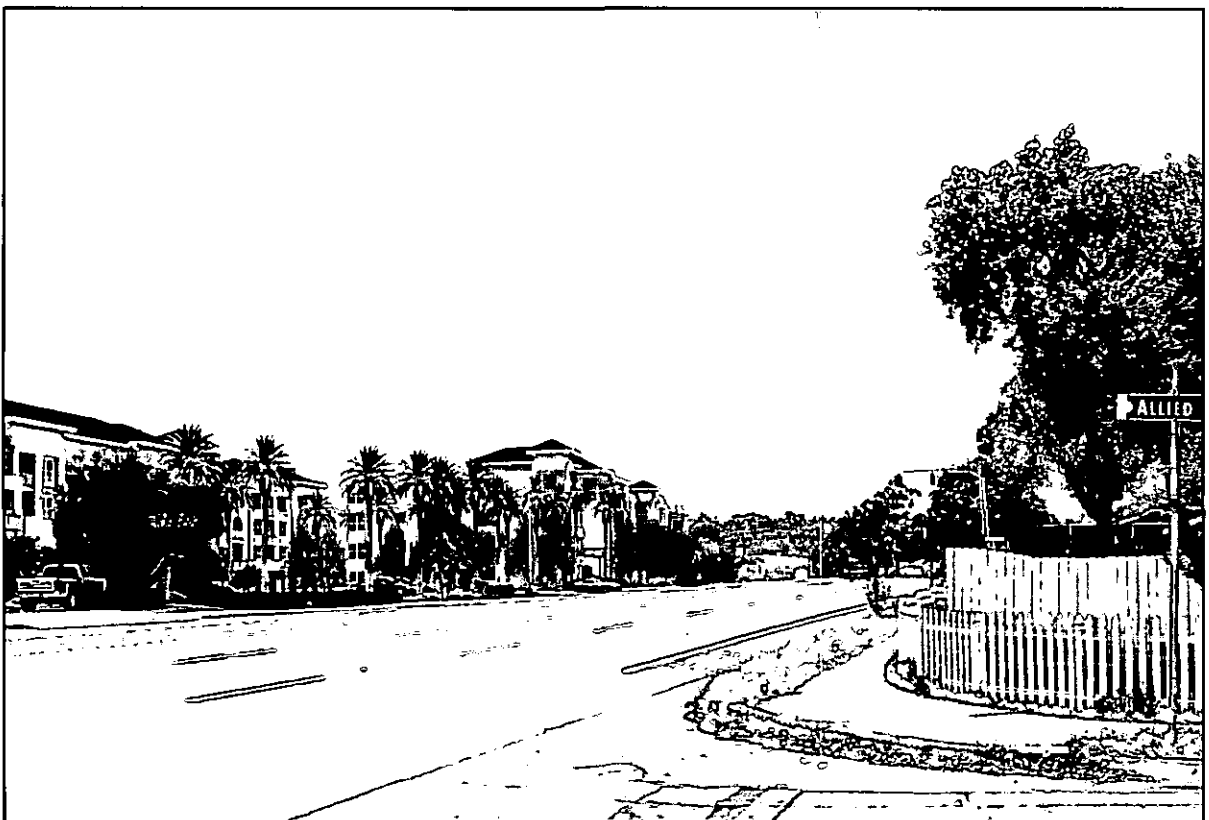
After

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FIGURE 4.10-6  
Photosimulation 1 View from East at Greenbrier Avenue



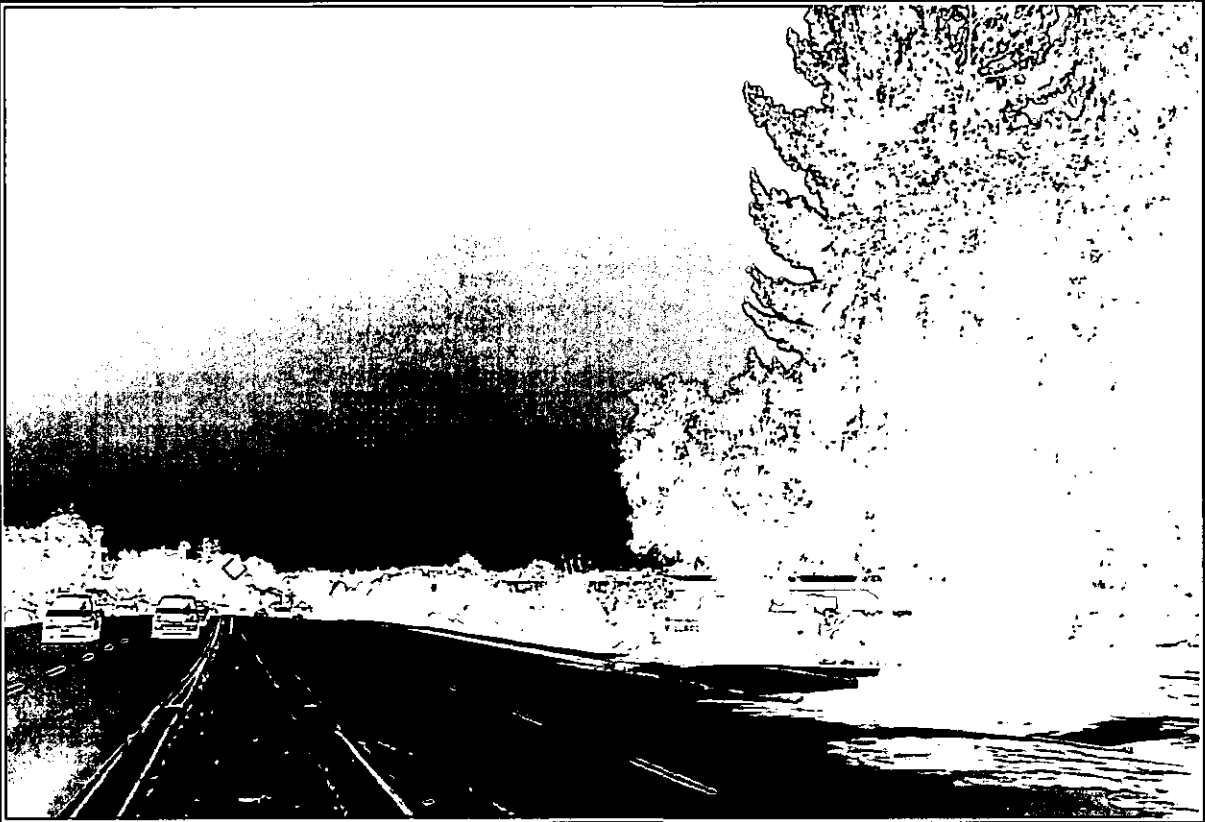
Before



After

600442

FIGURE 4.10-7  
Photosimulation 2 View from South on Mission Gorge Road



Before



After

FIGURE 4.10-8  
Photosimulation 3 View from North on Mission Gorge Road

alter the visibility of the river from public roadways, given that the river is currently obscured from area roadways, but would create taller intervening structures by replacing the single-story mobile homes with two-, three-, and four-story rental condominiums. However, as illustrated in the photosimulations and described in Section 3.4.2.3.c, the proposed Mission Gorge Road streetscape design would enhance views of the project site. Project implementation would additionally provide potential east-west view corridors into the project site through its incorporation of several landscaped ground-level courtyards (refer to Figures 3-10 through 3-13). Views to the planned River Park open space would also be provided through the side yard setbacks along the north and south edges of the project site.

### ***Views from Golf Course/River Corridor***

Figures 4.10-9 and 4.10-10 provide before and after views from the Admiral Baker Golf Course located within the San Diego River corridor just west of the project site. As evidenced in the before images, current views of the project site from the golf course and river corridor are dominated by landscape vegetation. The one-story mobile homes are not prominent in these views.

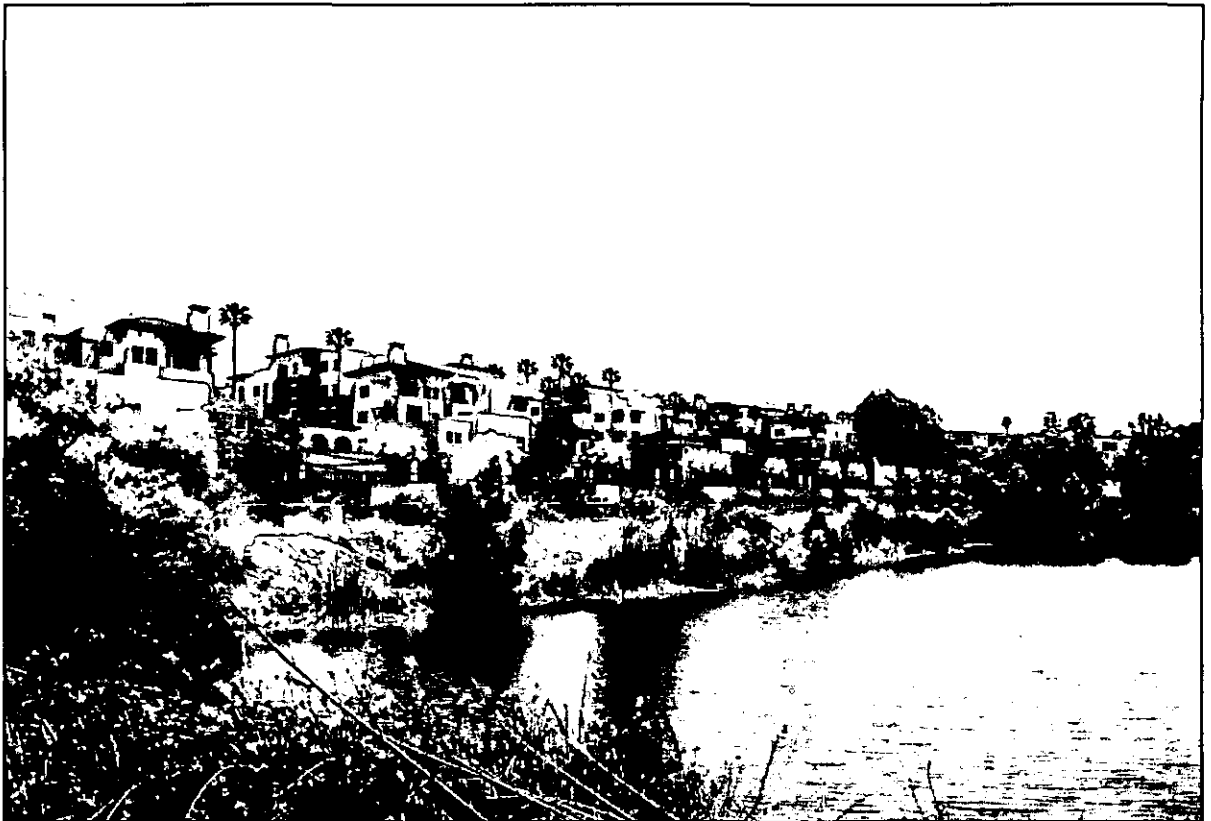
As the post-project photosimulations show, implementation of the proposed project would alter current views from the golf course and river corridor by replacing the single-story mobile homes with taller and more massive two-, three-, and four-story condominium buildings. However, views of the proposed project from the planned River Park would be screened or softened through extensive landscaping and architectural design as recommended in General Plan policies and as required in the CPIOZ regulations and MSCP Land Use Adjacency Guidelines, as well as in the San Diego River Park Master Plan. In accordance with CPIOZ regulations, the buildings facing the river would be set back from the river by at least 40 feet, at the ratio of one foot for every foot of building height. Buildings would also step back away from the floodway so that the lower-story units would be nearer to the river and the higher-storied units would be tiered back and upward, farther away from the river.

A public river-front bike and walking path overlooking the golf course and River Park would be provided along the western project perimeter. Through collaboration with Navy golf course planners and with the Grantville Redevelopment Project Area planners, this path would connect to potential future river park trails to the north and south, thus, creating a continuous public multi-use trail near the river.

The landscaping along this western edge of the project would include extensive planting to visually screen the proposed 12-foot-high maximum retaining wall. Wall plantings would consist at minimum of 75 percent native and 25 percent drought tolerant non-invasive plant material providing 80 percent screening of the wall within two years. Native screening trees would be used at the bottom of the wall at a minimum of 30-foot intervals. The plantable wall would be interrupted at regular intervals with stone veneer



Before



After

FIGURE 4.10-9

Photo Simulation 4 View from North on Golf Course

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Before



After

FIGURE 4.10-10

Photo Simulation 5 View from South on Golf Course

000446

traditional retaining walls that would provide tree pockets and overlooks to the golf course and River.

Project implementation would additionally provide potential west-east view corridors into the project site through its design that includes several landscaped, ground-level open-space courtyards. As described in greater detail in Section 3.4.2.3.a and illustrated in Figures 3-10 through 3-13 of this EIR, the design theme for these open space areas complements the river and would provide on-site educational opportunities regarding the historical and ecological significance of the river.

For these reasons, project impacts to public views would not be significant.

#### **4.10.3.2 Significance of Impacts**

Given existing visibility conditions (large distances or elevational differences; or intervening vegetation, structures, or landform), and project design measures (setbacks, step backs, architectural treatments, and landscaping), the proposed project would not substantially alter or block public views from designated open space areas, public roads, or public parks and would not have a cumulative effect by opening up a new area for development (as it is already developed) which would ultimately cause extensive view blockage. Public view impacts would not be significant.

#### **4.10.3.3 Mitigation, Monitoring, and Reporting**

No significant impacts to public views or scenic resources have been identified and no mitigation is required.

### **4.10.4 Issue 2: Bulk and Scale**

Would the proposed project's bulk, scale, materials, or style be incompatible with the surrounding existing or planned development?

#### **4.10.4.1 Impacts**

As described above, currently, land south of the project site is developed in medium-density, two- and three-story residential condominiums. Land immediately to the north is currently developed in industrial storage uses and is occupied by machinery, vehicles, and scattered low-profile structures. Across the six-lane primary arterial (Mission Gorge Road) located east of the project site, land is developed in low-density one- and two-story single-family residences. A couple of neighborhood parks and a one-story elementary school are distributed within this single-family residential area. The multi-story Kaiser-Permanente hospital is located along the edge of the single-family residential area, south of the project site. Land west of the project site is developed as a

golf course with a one-story clubhouse, surface parking lot, lawns, and ornamental vegetation. The San Diego River corridor and City MHPA lies further west of the project site, overlaying portions of the golf course.

The proposed project would be largely compatible with the medium-density three-story condominiums to the south, but would result in an intensification of structure height and bulk, that would be inconsistent with existing developments to the north and east. These inconsistencies would not, however, pose significant adverse impacts as described below.

#### **a. Structure Heights**

The project proposes average heights of 55 feet from proposed grade for residential structures and 59 feet from proposed grade for the parking structure. The existing RM-3-7 zone restricts maximum heights to 40 feet above the lower of existing or proposed grade and, as identified in Section 3.0 of this EIR, the project is proposing a deviation from the structure height requirements of the RM-3-7 zone.

Measured from proposed grade, the main body of the residential structure would be approximately 47 feet in height. Other structural features, such as elevator towers, stairwells, and architectural elements, may extend above the main structure roof height resulting in a maximum structure height of 55 to 59 feet from proposed grade. (In calculating building heights for the purposes of the LDC, calculations must be based on the lower of the existing or proposed grade, even if the project is proposing to fill the lower portion of the site in order to raise it out of the floodplain, as is the case with the proposed project. Based on calculations to determine consistency with the LDC height requirements, the project's main residential structure height would be at a maximum of 73 feet above existing grade. See Section 4.1.3 of this EIR for further analysis of the proposed building heights relative to the LDC.)

Currently, structure heights of surrounding development range from one to three stories. While the project's proposed structure heights would arguably be similar to and compatible with the existing two- and three-story medium-density condominium development south of the project site, it would not be similar to the existing low-profile structures north or east of the project site.

The height and bulk of the proposed project would not be visually consistent with the low-profile structures or scattered vehicles and machinery associated with existing industrial storage uses to the north. It would also not be visually consistent with the existing quarry operation further to the north. Proposed structure heights and bulk would additionally not be consistent with the low-density one- and two-story single-family residences located across Mission Gorge Road. Nor would the proposed project be visually similar to the low-intensity uses of the golf course and adjacent San Diego River.

However, these inconsistencies would not comprise a significant impact because project implementation would ultimately not create a negative visual appearance as defined by the City's Significance Thresholds. As defined in the Thresholds, the proposed project's bulk and scale would be considered significantly incompatible with surrounding development if it: (a) creates a disorganized appearance that substantially conflicts with City codes; (b) conflicts significantly with the height, bulk, or coverage regulations of the zone and does not provide architectural interest; (c) constructs crib, retaining, or noise walls greater than six feet in height and 50 feet in length with only minimal landscape screening where the walls would be visible to the public; or (d) creates an exceedingly monotonous visual environment.

The proposed project would not create a disorganized appearance or an exceedingly monotonous visual environment. Many features of the project design would provide architectural interest. The project has been designed to include building and roofline articulations that would create an attractive and interesting façade to residential buildings. Variety in building textures, colors, pop-outs, and other elements would result in an aesthetically pleasing addition to the community. Photographic simulations (photosimulations) of post-project conditions are shown in Figures 4.10-6 through 10 and color renderings of the building elevations illustrating the character of the project design are provided in Figures 3-4 through 3-7 of Section 3.0. Buildings have been designed to step down on the western side of the project, reducing bulk of the structures at the property boundary where a portion of the project site is adjacent to the San Diego River Park. In addition to these architectural considerations, the proposed Landscape Development Plan (refer to Figures 3-10 and 3-11 of Section 3.0) includes a variety of plantings and plant materials that would not only create an enjoyable experience for residents but would also enhance and soften the exterior project elements.

Furthermore, while land north of the project site is currently developed in low-profile industrial uses, it is planned for medium- and high-density residential use, with structure heights likely to be three or more stories. The existing industrial storage site immediately north of the project site is proposed for medium-density residential development (the Graver-Bradley project); while further to the north the existing site of the Superior Ready Mix quarry operation is proposed for medium- and high-density residential and commercial uses (the RiverPark project). The structure heights of the proposed project would be consistent with these future planned developments.

In conclusion, the proposed project's height and bulk, while not consistent with some of the existing surrounding development, would not result in a negative visual appearance given project design that would create an organized and architecturally interesting development. Impacts would therefore not be significant.

### **b. Side Yard Setback**

The existing RM-3-7 zone requires a minimum setback of 80 feet. However, as identified in Section 3.0 of this EIR, the project is proposing a deviation from the side yard setback requirements of the RM-3-7 zone to allow a minimum 36-foot variable side yard setback. (Actual structures would be set back from the northern property line by 44 to 54 feet.) The deviation would be necessary to more efficiently utilize the site area and build out to maximum density.

As defined in the City's Significance Determination Thresholds, deviations from height, bulk, or coverage regulations of the underlying zone would only be considered significant if the project does not provide architectural interest, or creates an exceedingly monotonous visual environment or a disorganized appearance.

The project design, including the proposed side yard setback deviation, would not create a disorganized appearance or an exceedingly monotonous visual environment. Instead, many features of the project design would provide architectural interest, as described above under *Structure Heights*. Additionally, the setback area would be landscaped and would function as a view corridor to the San Diego River. Therefore, the proposed deviation from side yard setback requirements would not be significant.

### **c. Retaining Wall Height**

The existing RM-3-7 zone requires retaining walls to be a maximum of six feet in height. However, as identified in Section 3.0 of this EIR, the project is proposing a deviation from the retaining wall height requirement to allow a retaining wall with a maximum visible height of 12 feet along the western setback line. Because the western portion of the project site is within the 100-year floodplain of the San Diego River, project grading proposes to raise the site's final building elevation out of the floodplain, thus resulting in the need for the retaining wall along the western edge of the property.

As defined in the City's Significance Determination Thresholds, deviations from height, bulk, or coverage regulations of the underlying zone would be considered significant if the project does not provide architectural interest, creates an exceedingly monotonous visual environment or a disorganized appearance, or constructs crib or retaining walls greater than six feet in height and 50 feet in length with only minimal landscape screening where the walls would be visible to the public.

The project design, including the proposed retaining wall height deviation, would not create a disorganized appearance or an exceedingly monotonous visual environment. *Instead, many features of the project design would provide architectural interest, as described above under Structure Heights.* The retaining wall would occur along the west project setback line, away from the highly visible portions of the project site. No portion of the retaining wall, including portions of the wall in excess of six feet, would occur in

high visibility areas. A color rendering of the western building elevation and retaining wall is provided in Figure 3-7 of Section 3.0.

The proposed landscape screening of the retaining wall would be extensive. The retaining wall would be a plantable-cell wall planted with hanging shrub material. Additional plantings would be provided at the top and base of the retaining wall, with substantial screening provided by landscaping with large shrubs and vines). Photo simulations of post-project views of the west edge of the project, including the retaining wall, are shown in Figures 4.10-9 and 4.10-10. A landscape detail showing how the proposed plantings will screen the walls from public view is shown in Figure 4.10-11. The shorter portions of the retaining wall would be fully screened with large foundation shrub planting. Therefore, the proposed deviation from the LDC's retaining wall height limit would not result in significant impacts related to incompatibility of bulk and scale.

#### **d. Vehicular Use Area Plantings**

The project proposes a deviation from the tree planting requirement for the upper deck of the parking structure (per Table 142.04D of the Municipal Code); and instead proposes the use of shade/solar structures on the upper deck of the parking structure.

By allowing the use of shade structures or solar-panel canopies instead of trees, the proposed deviation from the vehicular use area planting regulations would not result in degraded visual quality. The project proposes shade structures or "shade sails" or "tents" to provide the same shading and cooling function as trees. "Solar trees" or a canopy of photovoltaic panels may alternatively be installed on the upper level parking deck instead of trees.

Visually, the shade/solar structures would likely be comprised of overhead, awning-type shade canopies supported by central poles with branching arms; at roughly four awnings per central support pole. Visibility of the structures would be limited outside of the project site due to the wrapped nature of the project design. The architectural design of the shade support structures and tent/canopy materials would be coordinated to complement the design and color of the condominium buildings and would ensure that no significant visual or land use compatibility impacts would result. The appearance of the proposed shade/solar structures would be visually neutral or benign, and not stand out as visual nuisances.

#### **e. Non-Parking Uses Floor Area Ratio**

The project is proposing a deviation from the FAR non-parking uses square footage maximum to allow an additional 74,904 square feet of non-parking uses, for a total of 609,178 square feet of non-parking uses. Approximately 27,400 square feet of this amount would lie underground; thus the resulting project FAR non-parking uses coverage would be reduced to 47,506 square feet or 7.8 percent beyond the allowable.

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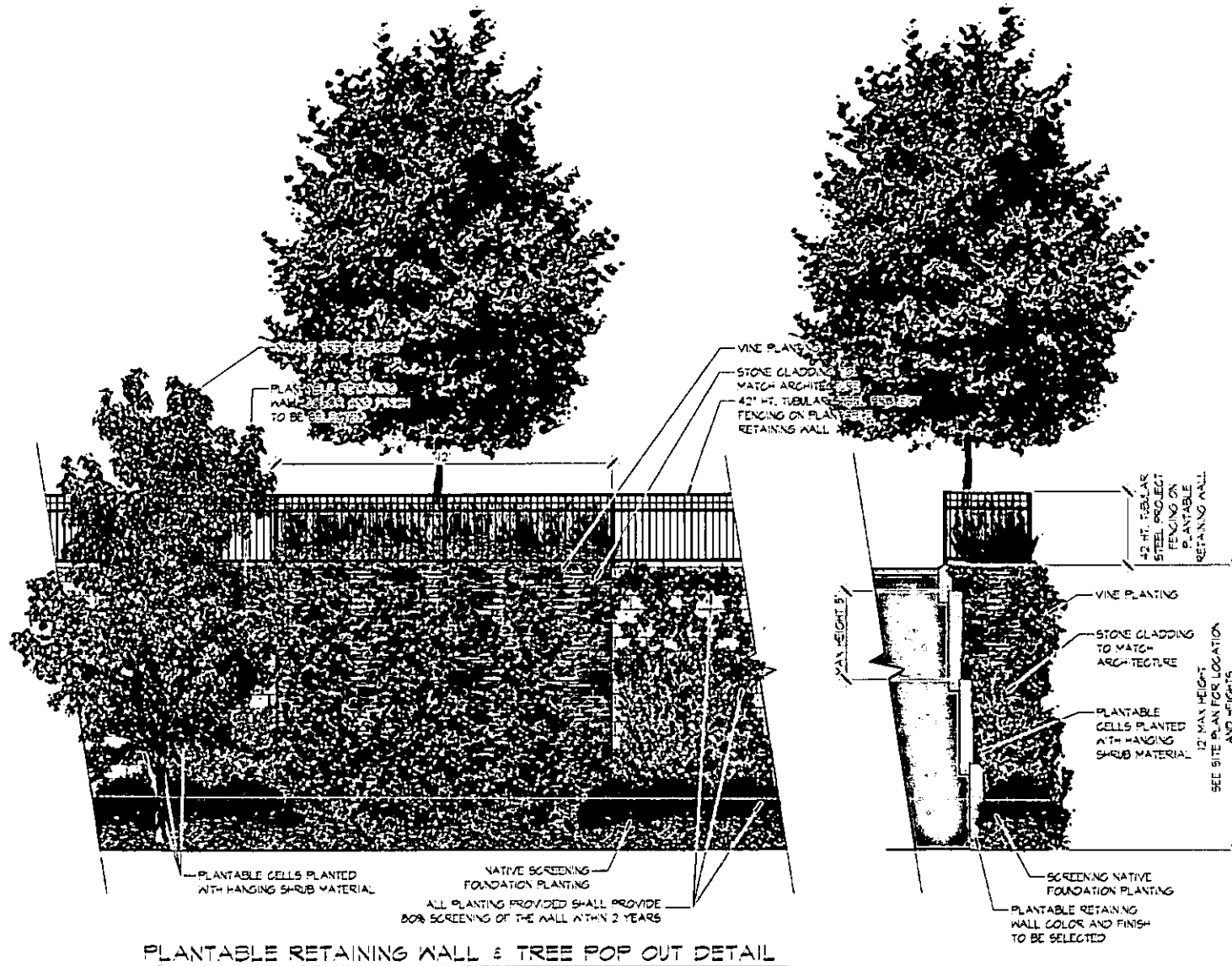


FIGURE 4.10-11  
Retaining Wall Landscape Detail

From a visual standpoint, this deviation request would have no discernable visual component. The FAR requirements do not take into account the wrapped style of the proposed project. Because the project design proposes to wrap the condominium complex around the compact, centrally located, vertical parking structure, the proposed above-ground parking structure would be comparable to an underground parking structure which the FAR requirements account for in both function and form. The proposed deviation and increase in non-parking uses FAR would therefore not pose significant bulk and scale impacts.

#### **4.10.4.2 Significance of Impacts**

The proposed deviations from the structure height, side yard setback, retaining wall height, vehicular use area planting, and FAR regulations of the underlying zone would not be significant because the project design would provide architectural interest, a varied appearance, and construction of a retaining wall that would not be highly visible yet would be extensively screened with landscaping. Impacts would not be significant.

#### **4.10.4.3 Mitigation, Monitoring, and Reporting**

No significant visual impacts would result from the proposed deviations from the underlying zone, and no mitigation is required.

### **4.10.5 Issue 3: Community Character**

Would the proposed project cause a substantial alteration to the existing or planned character of the area, the loss of a distinctive or landmark tree(s), or stand of mature trees as identified in the Navajo Community Plan?

#### **4.10.5.1 Impacts**

The following evaluation of how the proposed project would fit or blend with the existing and planned character of the community considers the project's design elements relative to neighboring built and natural environments, as well as to the site-specific CPIOZ supplemental design criteria. (Bulk and scale play a key role in defining the project's design and are addressed separately in greater detail in Section 4.10.4 above.)

##### **a. Community Character Assessment**

The architectural design of the proposed Archstone - Mission Gorge project incorporates the recommendations of the CPIOZ which include site specific design criteria for residential properties abutting Mission Gorge Road between Zion Avenue and Old Cliffs Road. Accordingly, the project design has considered the arrangement of buildings and exterior useable open space areas, combined with project landscaping and architectural

style, to create a pleasant internal visual quality, as well as non-degraded views from adjacent areas within the community. Photo simulations of post-project conditions provided in Figures 4.10-6 through 4.10-10 and color renderings of the north, east, south, and west building elevations provided in Figures 3-4 through 3-8 generally depict how the proposed project would appear from neighboring areas. These figures additionally illustrate the proposed architectural style of the project, which is characterized as a modern interpretation of Irving Gill architecture, known for a precise expression of simple and elegant forms. As shown, traditional hipped roofs would be infused with modern forms and strategically positioned to create a sense of movement, organization, and order to the building elevations. The mass of the four-story buildings would be further articulated vertically and horizontally with the use of arches, roof overhangs, canopies, and trellises. The planned colors of the buildings would include a range of earth tones, with color-blocking techniques use to break up building mass.

While the project design comprises an attractive product, it would nonetheless comprise a stark contrast to existing community character, particularly with existing industrial development to the north and low-density residential developments east across Mission Gorge Road. In these locations, the existing nondescript low-profile industrial buildings (to the north) and the post-World War II suburban style one- and two-story single-family residences within the Allied Gardens neighborhood (east of Mission Gorge Road) comprise substantially dissimilar architectural styles compared to the proposed project.

In regard to the existing single-family residential uses east of Mission Gorge Road, the 132-foot-wide Mission Gorge Road comprises a sufficient buffer and demarcation between the dissimilar architectural styles such that the contrast between them is rendered not adverse nor significant. In addition, proposed landscape screening and other design features incorporated into the project (discussed below) would soften contrasts with neighboring uses (Allied Gardens) to a level below significance.

While the project design would not be considered consistent with the existing character of the developments to the north, this contrast alone does not constitute a significant impact. Considering the disorganized and sparsely landscaped character of the area to the north, the proposed project would by virtue of its compliance with CPIOZ regulations (intended to improve the visual quality of the area to the north, along Mission Gorge Road), be encouraged to be dissimilar in character to the neighboring uses to the north.

For these reasons, community character impacts would not be significant.

The following design elements of the proposed project serve to improve the interface between it and neighboring uses and to preclude potential significant visual impacts.

## **b. Project Design Features**

### ***Landscaping***

In accordance with the CPIOZ, the proposed project would provide an extensively landscaped street yard. In addition, landscaping would be used to soften the appearance of perimeter walls and residential structures from Mission Gorge Road and from adjacent uses.

The patterns of landscaping and materials used in the development would be generally consistent in species, quantity, and size with that of the surrounding area. Curbside landscaping, varied setbacks, and enhanced paving would be provided to enhance the visual appearance of the development. Landscaping would also be provided on the upper parking structure level, consistent with City requirements. Parking structure shade requirements would be met through the use of shade tent structures.

The proposed plant palette (refer to Figure 3-11) has been selected to provide a variety of experiences. The focus is on providing drought-tolerant plant species to the maximum extent possible, while still maintaining the unique landscape theme for the project. The landscape design intent of the project is to provide both passive and active spaces for the residents' enjoyment while using plant material that accent and frame the project architecture and enhances the pedestrian scale of the project.

**Useable Exterior Open Space.** The proposed project would provide many open space opportunities, including three featured courtyards on the west side of the property: the Flume Court, the Orchard Court, and the Open Green Court; and three courtyards on the east side of the property: the River Court, the Dry Stream Court and the Native Court. The courtyards have been located and landscaped to avoid being closed in, while creating view corridors to the river and community. A detailed and diverse color palette along with the enriched paving accenting the courtyard pathways (refer to Figures 3-11 and 3-12) would maintain visual interest.

Passive open space areas would provide seating and gathering spaces for residents' interaction and leisure activities. In addition, outdoor pedestrian spaces would be designed with consideration for persons with disabilities through careful selection of materials and design of accessible circulation routes and site furnishings throughout the project site.

### ***Parking Structure***

The parking structure, central to all residents, would be developed with architectural details, coloration, textures, and plantings that would make it blend into the development and minimize impacts to residential views. The various portions of the rental condominium building would have pedestrian-oriented details, such as first-floor patios,

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balconies, window treatments, and vibrant plantings to create a pleasant atmosphere for residents traversing the property.

### ***Streetscape/East Interface***

The proposed project would provide non-contiguous sidewalks along Mission Gorge Road and the undergrounding of on-site utilities, in accordance with the CPIOZ design criteria. In addition, street trees would be planted along Mission Gorge Road consistent with the predominant species in the area, and with the City of San Diego's Street Tree Selection Guide. Specifically, the project has proposed the use of *Platanus acerifolia*, *Jacaranda mimosifolia*, and/or the *Koelreuteria paniculata* as street trees along Mission Gorge Road. Planting of these street trees along Mission Gorge Road would be consistent with surrounding areas and would provide continuity throughout the Navajo community planning area.

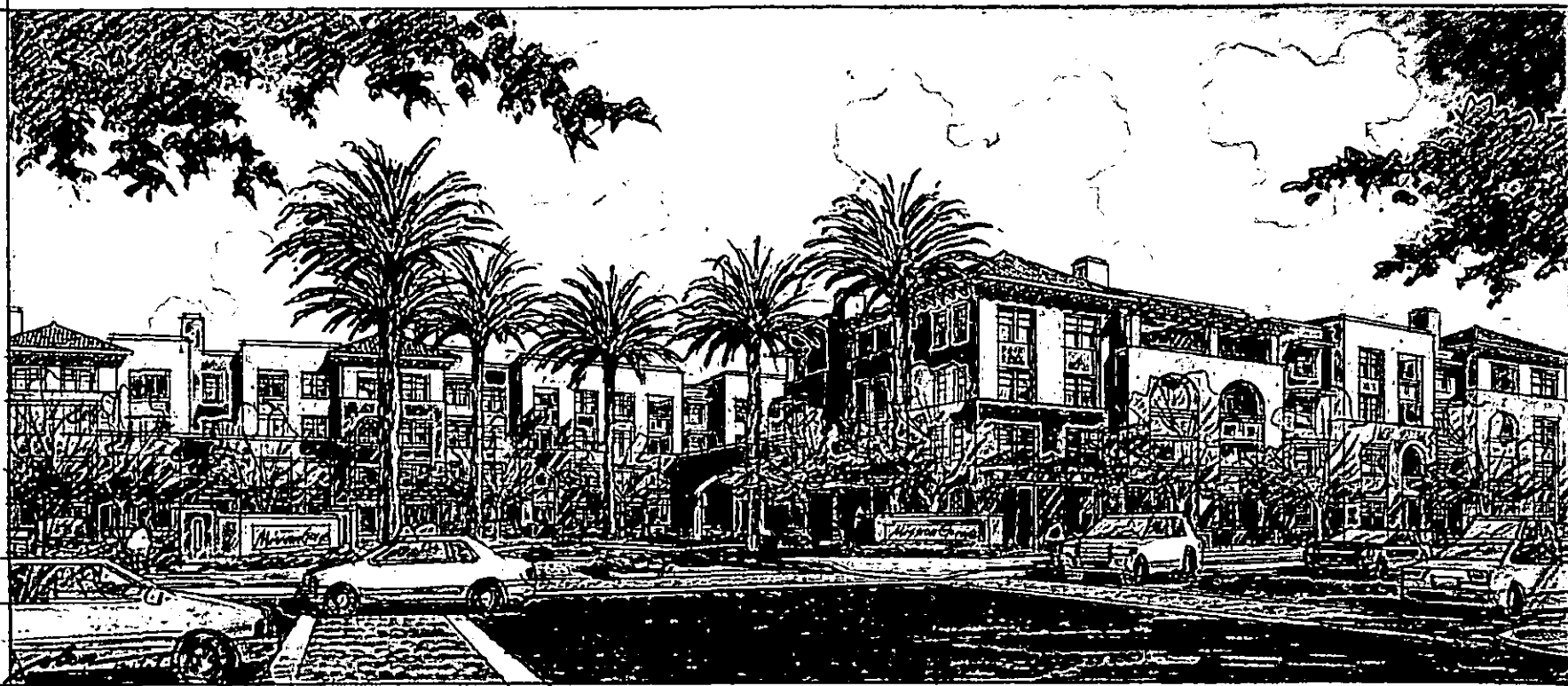
Project entries (access) from Mission Gorge Road would feature enhanced paving and inviting landscaping, as illustrated in the post-project photosimulation of Figure 4.10-6, and in Figures 4.10-12 and 4.10-13. The design of the primary entrance and adjacent recreation area reflects a contemporary style that has been incorporated into the various recreational amenities, including an outdoor fireplace, pool, spa, pool cabanas, fire pit, and barbecues. As illustrated in the plan view of the primary entry (see Figure 4.10-13), a water feature is planned to be installed.

Building façades facing Mission Gorge Road would be constructed with the pedestrian in mind and include architectural features such as decorative corbels and fascia, parapet fascia detail, painted window trims, metal awnings, trellises, painted metal balcony railings, and wrought iron entry gates and fences. Refer to Figure 3-6 in Section 3.0 for an illustration of the east building elevation facing Mission Gorge Road. Refer to Figures 4.10-6, 4.10-7 and 4.10-8 for photosimulations of the east-facing building elevations.

From Mission Gorge Road, pedestrians, passing motorists, and nearby residents would have views of lushly planted vegetation and residential buildings, as well as glimpses into the three eastern courtyards of the project, the River, Native and Dry Stream courtyards. The River Court presents an abstract portrayal of the San Diego River and the variety of native ecozones along it from its source to its outlet. The Native Court pays tribute to the cultural history of this region by using native plantings and design elements that abstractly represent traditions of the indigenous cultures; and the Dry Stream Court plays off the natural history of the San Diego region, with a dry stream bed meandering through the space.

### ***Riverscape/West Interface***

The majority of the project site is separated from the San Diego River by the Admiral



*ENTRY PERSPECTIVE - MISSION GORGE*

FIGURE 4.10-12  
Primary Entry Perspective from Mission Gorge Road

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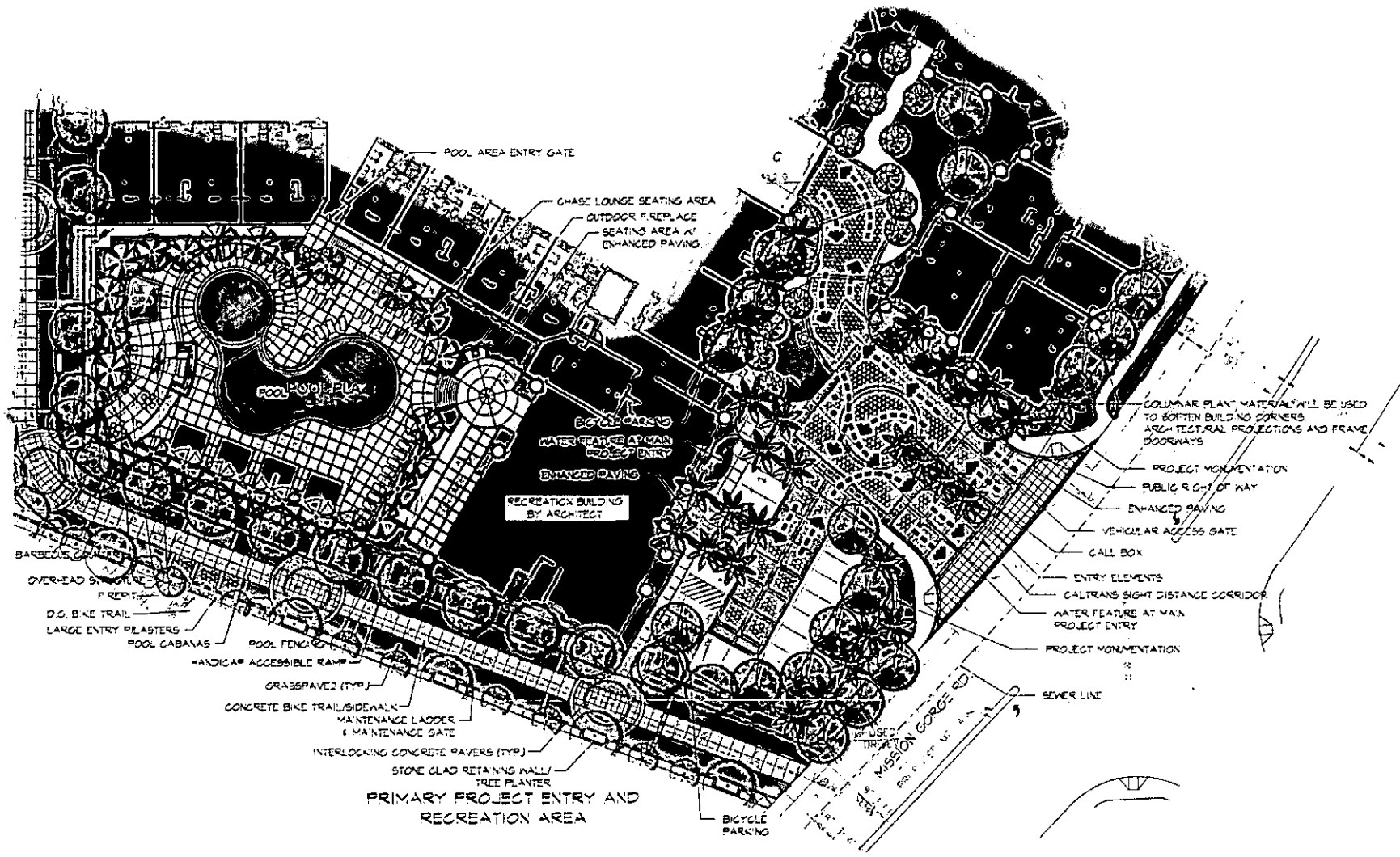


FIGURE 4.10-13  
Plan View of Primary Entry

Baker Golf Course. Where the project site is proximate to the San Diego River corridor, setbacks would be provided that meet the CPIOZ regulations regarding the 100-year floodplain including requirements for a river trail. Accordingly, the proposed project would be setback from the San Diego River by at least 40 feet, at the ratio of one foot for each foot of building height. Residential building heights along this western edge would range from 25 feet to 35 feet from proposed grade, as structures would be stepped back away from the floodway, with lower-story buildings adjacent to the river and the higher-story building tiered away from it.

On the west side of the property, patrons of the Admiral Baker Golf Course and pedestrians or bicyclists using the proposed multi-use river trail would be treated to similar architectural details as the building façades facing Mission Gorge Road. (Refer to Figure 3-7 for an illustration of the west building elevation.) As depicted in Figures 4.10-9 and 4.10-10, landscaping would include native species and riparian flora to complement the San Diego River, which lies adjacent to the northwest portion of the project site. Additionally, pedestrians and golfers may glimpse into portions of the three western courtyards: the Flume Court, which represents the missionaries who built the Mission Gorge dam and flume by a channel lined with ornamental grasses; the Orchard Court, which represents the importance of the San Diego River as a water source supporting Mission Valley's historical agricultural uses through a grove reminiscent of the food-production that sustained early settlers; and the Open Green Court, which mirrors the sculpted aesthetics of the Admiral Baker Golf Course by offering a grassy space with seating areas to provide a comfortable outdoor amenity for passive use.

The 12-foot-high retaining wall proposed on the western boundary of the project site would act as a buffer between the project and the MHPA associated with the San Diego River. The wall would not be visible to the public from a public street. A small portion of the north end of the wall may be visible to the adjacent portion of the planned San Diego River Park; however, landscaping would minimize the appearance of the wall. The retaining wall would be a plantable-cell wall, with foliage at the top and base of the wall to blend the retaining wall in with the natural surroundings and minimize its bulk. A landscape detail showing how the planting will screen the walls from public view is shown in Figure 4.10-11. The shorter portions of the retaining wall would be fully screened with large foundation shrub planting.

**Multi-Use River Trail.** A continuous 10-foot minimum width pedestrian/bicycle trail would be provided along the river frontage within the 20-foot minimum setback, in accordance with the CPIOZ regulations and the recommendations of the San Diego River Park Draft Master Plan. All structures within 150 feet of the river floodway would be provided at least one pedestrian entrance from the structure to the river trail. To promote the river as a project amenity, the pedestrian trail adjacent to the San Diego River would be landscaped, and a viewing area would be installed to offer residents a

place to observe the river. The multi-use river trail would be accessible to the public during daylight hours.

### ***Connectivity***

The project's design would interact positively with the San Diego River Park Master Plan and with the redevelopment efforts underway within the Grantville Redevelopment Plan area. Through the creation of pedestrian connectivity with redevelopment area projects to the north, the project design would be consistent with the vision for the Grantville Redevelopment Plan. The project site is situated in between Grantville Redevelopment Subarea A to the south and Grantville Redevelopment Subarea B to the north. With the implementation of the Grantville Redevelopment Area plan, the community character of the project vicinity would change and improve. The visual character of the proposed project would be consistent with the intended character of the redeveloped community, including the areas north of the project site west of Mission Gorge Road, emphasizing high quality and aesthetically pleasing housing and mixed-uses.

Through project design and incorporation of a multi-use river trail, the project would be consistent with the vision for the planned River Park. The proposed river trail (discussed above) would be publicly available to community residents during daylight hours and would provide pedestrian/bicycle connectivity proposed with the adjacent project site (Garver-Bradley) to the north.

### **4.10.5.2 Significance of Impacts**

The project design would not be consistent in character with the existing character of the disorganized and sparsely landscaped low-profile industrial uses to the north, nor with the existing one- and two-story suburban homes within the Allied Gardens neighborhood east of Mission Gorge Road. Considering the disorganized and sparsely landscaped character of the area to the north, the proposed project would by virtue of its compliance with CPIOZ regulations (intended to improve the visual quality of the area to the north, along Mission Gorge Road), be encouraged to be dissimilar in character to the neighboring uses to the north. In consideration of the distance between the proposed project and single-family homes within the Allied Gardens neighborhood, and the separation between the uses by a six-lane primary arterial, the project is not considered to adjoin this community. Nonetheless, the proposed design includes several elements that would enhance its interface with neighboring uses. Neighborhood character impacts would therefore not be considered adverse nor significant.

### **4.10.5.3 Mitigation, Monitoring, and Reporting**

No significant neighborhood character impacts have been identified and no mitigation is required.

### **4.10.6 Issue 4: Landform Alteration**

Would the proposed project create a substantial change in existing landform?

#### **4.10.6.1 Impacts**

In accordance with the City's significance thresholds, a significant impact to natural landform impact would result if implementation of a proposed project would alter more than 2,000 cubic yards of earth per graded acre by either excavation or fill, and one or more of the following conditions apply: (a) project grading would disturb steep (25 percent gradient or steeper) slopes in excess of the encroachment allowance of the ESL regulations and steep hillside guidelines (SDLDC, Section 143.0101); (b) the project would create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent) slope gradient; (c) the project would result in a change in elevation of steep natural slopes from existing grade to proposed grade of more than five feet by either excavation or fill, unless the area over which excavation or fill would exceed five feet is only at isolated points on the site; or (d) the project design includes mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures.

The proposed Grading Development Plan is shown in the Project Description Figure 3-14. The project proposes approximately 54,000 cubic yards of cut and 74,000 cubic yards of fill, necessitating the import of 20,000 cubic yards of fill. This amount of earthwork would exceed the 2,000 cubic yards of earth graded per acre threshold, as the proposed grading would amount to approximately 7,240 cubic yards of earth graded per acre.

While the proposed volume of earthwork would exceed the City's threshold, the resulting landform would generally mimic the existing landform condition which has already been altered through grading and development. As mentioned throughout this EIR, there are no natural landform features on the site. The existing site is generally flat and has an elevation difference of 30 feet due to the terraced grading that was done in the late 1950s to accommodate the existing mobile home park. The proposed grading includes the import of fill material to raise the elevation of the site above the floodplain, while maintaining the generally flat condition of the site.

#### **4.10.6.2 Significance of Impacts**

The project grading would not significantly alter the existing landform on the site.

#### **4.10.6.3 Mitigation, Monitoring, and Reporting**

Alteration to natural landform associated with the project would not be considered significant and no mitigation measures are required.

### **4.10.7 Issue 5: Light and Glare**

Would the proposed project create a substantial amount of light or glare that would adversely affect daytime or nighttime views?

#### **4.10.7.1 Impacts**

The proposed project is not anticipated to create a substantial amount of light or glare that would adversely affect daytime or nighttime views. Project lighting has been designed to comply with several applicable regulations, including the MSCP Subarea Plan Land Use Adjacency Guidelines, the CPIOZ supplemental development regulations, and the City's Outdoor Lighting Regulations (LDC, Section 142.0740). Exterior lighting requirements such as the installation of timers or motion-sensors, shields or diffusers, directional lighting, and limits on illumination, have been incorporated into project design and would serve to avoid light and glare effects on adjacent uses or to nighttime dark skies.

#### **4.10.7.2 Significance of Impacts**

Given project compliance with applicable lighting regulations, light and glare impacts would not be significant.

#### **4.10.7.3 Mitigation, Monitoring, and Reporting**

No significant light or glare impacts have been identified and no mitigation is required.

## 4.11 Population and Housing

This section addresses the displacement of people or existing housing that would result with the proposed project, specifically, resulting from discontinuation of the existing mobile home park. The discussion is based on the Relocation Impact Report originally prepared for the project by Overland, Pacific & Cutler in 2007 and updated in July 2008. As required by California Government Code (Section 65863.7 et seq.), California Mobile Home Residency Law (Civil Code Section 798 et seq.), and the City's Mobile Home Park Discontinuance and Tenant Relocation Regulations (Municipal Code, Sections 143.0610-0640), this Relocation Impact Report (RIR) has been prepared to report on the impact of the conversion upon the displaced tenants of the mobile home park and mitigate the adverse impact of the park closure. Pursuant to Section 65863.7, the measure required to mitigate the adverse impact of the park closure on the displaced mobile home park tenants shall not exceed the reasonable costs of relocation. The RIR addresses current demographics of the existing mobile home park and the vicinity, evaluation of housing availability and affordability, including availability and affordability of mobile home parks spaces within other mobile home parks, and identification of relocation opportunities and assistance measures. The Relocation Impact Report can be reviewed in its entirety as Appendix M included in this EIR.

### 4.11.1 Existing Conditions

#### 4.11.1.1 Housing Supply and Demand

SANDAG, of which the City of San Diego is a member, is the agency responsible for preparing regional population, housing, and employment projections for the San Diego area. SANDAG's Series 7 regional growth forecast, developed in fall 2006, is the principal planning tool for regional land use, transportation, and natural resources planning. SANDAG's regional growth forecasts are derived from population projections based on planned land uses allowed in member governments' land use and development plans (i.e., general and community plans). SANDAG's latest forecast projected that in 2030 there would be a regional housing capacity shortage, with 288,700 additional homes needed. This number is roughly equivalent to the entire remaining housing capacity as allowed under existing land use plans in San Diego County.

##### a. SANDAG's Regional Comprehensive Plan and Housing Element

SANDAG's Regional Comprehensive Plan (RCP) provides a growth management strategy for the region's growth that aims to preserve natural resources and limit urban sprawl. In accordance with smart growth principles, the overall goal of the RCP is to strengthen the integration of local and regional land use, transportation, and natural resource planning. As stated in the RCP's Regional Housing Element, new housing

should be located within already urbanized communities close to jobs and transit in order *“to help conserve open space and rural areas, reinvigorate existing neighborhoods, and lessen long commutes”* (SANDAG 2004).

## **b. City's Strategic Framework**

Similar to SANDAG's RCP, the City's Strategic Framework Element builds upon the principles of smart growth, and identifies a City of Villages Strategy that aims to answer forecasted population growth and development needs through effective and innovative redevelopment and infill. This strategy focuses growth into villages or mixed-use activity centers that are pedestrian friendly, offer a variety of housing types and range of densities, and are linked to a transit system. (See Section 2.6.1.2 of this EIR for a more detailed description of the Strategic Framework Element.)

## **c. City's Housing Element**

The City's 2005-2010 Housing Element, adopted in December 2006, more specifically analyzes the City's housing needs and identifies potential sites for the provision of additional housing in the city. In characterizing the existing housing supply and trends since 1970, the Housing Element states that “single-family detached dwellings continue to dominate San Diego's housing inventory, although their proportion has dropped from 1970 to 2004. In 1970, single-family units comprised 65 percent of all housing units ... and at the start of 2004 it was 55.7 percent, while multi-family units comprised 43 percent. The remaining one percent or so are mostly mobile homes” (City Housing Element, p. HE-146).

The Housing Element is intended to be consistent with and implement the adopted goals of the Strategic Framework Element. The Housing Element concludes that there is adequate residentially designated land available to meet housing needs for the current five-year cycle, but “eventually it will be necessary to rezone and redesignate more [residential] land to create capacity for more housing supply, especially after 2015” (City Housing Element, p. HE-5). It is anticipated that this process would occur as community plans are updated. However, the Housing Element emphasizes that “new housing must be well designed and permitted only in appropriate locations consistent with the City of Villages concept [and] gaining community acceptance of the higher-density housing that will need to be built will be a most challenging task” (City Housing Element, p. HE-5).

### **4.11.1.2 Housing Affordability**

In concert with housing shortages, regional housing authorities cite the current and projected lack of affordability of available housing as a major concern in the San Diego region.

### **a. SANDAG's Regional Housing Element**

In addition to stating the need for application of smart growth strategies in the siting and development of new housing, SANDAG's Regional Housing Element includes the primary goal to provide more housing choices in all price ranges. The RCP states that homes need to be affordable to persons of all income levels and accessible to persons of all ages and abilities.

### **b. City's Housing Element**

The City's 2005-2010 Housing Element includes an introduction titled San Diego's Affordable Housing Crisis which concludes that lack of affordability of available housing in the city comprises a housing crisis. The text notes that "the overall housing situation in the City has markedly worsened during the five years that have passed since the 1999-2004 Housing Element was adopted." And, while "the lack of affordable housing was primarily a problem for low- and very low-income residents and for people with special needs [in the past]; today a large majority of San Diegans cannot afford to purchase the median price home in this City or region ... and a large number of working people cannot afford any housing in the region—rental, or for sale" (City Housing Element, p. HE-3).

A primary goal of the City's Housing Element is to thus to ensure the development of sufficient new housing for all income groups and significantly increase the number of affordable housing opportunities. Given this goal and in consideration of the topic of mobile homes, the Housing Element states that "development of new mobile home parks in San Diego is no longer recommended or likely due to high land prices and the greater efficiency of providing affordable housing at higher multi-family densities" (City Housing Element, p. HE-28). It adds that "Mobile home parks have in the past provided affordable housing units both for rent and for sale. [However] high land costs and lack of vacant land now make it infeasible to construct new mobile home parks in San Diego and pressure to convert existing mobile home parks to more intensive uses has increased in recent years. Remaining residential land can house more people and provide more affordable units if developed with multi-family housing" (City Housing Element, p. HE-33).

### **c. City's Inclusionary Affordable Housing Regulations**

The City adopted an ordinance pertaining to the provision of affordable housing through inclusionary zoning in 2003. This affordable housing ordinance was added to the Municipal Code as the Inclusionary Affordable Housing Regulations (Municipal Code, Section 142.1300 et. seq.) and is consistent with the goals of the Housing Element to increase affordable housing opportunities. The ordinance generally applies to developments of two or more dwelling units and requires that 10 percent of the total dwelling units in the proposed development be affordable to targeted rental households or targeted ownership households. This requirement can be met by building on-site or

off-site in the same community or through payment of an in-lieu fee. Collected fees go into a new Inclusionary Housing Trust Fund administered by the Housing Commission to finance affordable housing development. (See Section 2.6.5.3 of this EIR for a more detailed description of the City's Inclusionary Affordable Housing Regulations.)

### **4.11.2 Significance Determination Thresholds**

The City's latest Significance Determination Thresholds do not include thresholds for population and housing. However, based on CEQA Guidelines Appendix G, the following threshold has been identified for the purpose of this EIR. Accordingly, for the purpose of this EIR, population and housing impacts would be considered significant if the proposed project would:

- Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere;

### **4.11.3 Issue 1: Displacement**

Would the proposed project displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?

#### **4.11.3.1 Impacts**

##### **a. Displaced Housing**

As part of the proposed project, the existing Mission Valley Village mobile home park would be discontinued and existing tenants would be displaced. Based on a survey conducted for the RIR it was found that 99 of the 119 spaces are currently occupied with tenant-owned coaches, one if owned by the park owner and rented to the park maintenance employee, and 19 are unoccupied. The known population of the park is 78 individuals, although the estimated population is 120 as some tenants did not complete the survey. While the proposed project would displace 99 mobile home units, housing an estimated population of 120 individuals, the existing mobile housing would be replaced with 444 rental condominium units, 20 percent of which would be affordable housing units. Thus, displacement of on-site tenants would not necessitate the construction of new housing elsewhere. The RIR concluded that there is ample housing available in San Diego and other nearby communities for the tenants of the mobile home park comparable to the Mission Valley Village

##### **b. Relocation Assistance**

Current tenants of the on-site mobile home park would have several options for relocation which include:

off-site in the same community or through payment of an in-lieu fee. Collected fees go into a new Inclusionary Housing Trust Fund administered by the Housing Commission to finance affordable housing development. (See Section 2.6.5.3 of this EIR for a more detailed description of the City's Inclusionary Affordable Housing Regulations.)

## 4.11.2 Significance Determination Thresholds

The City's latest Significance Determination Thresholds do not include thresholds for population and housing. However, based on CEQA Guidelines Appendix G, the following threshold has been identified for the purpose of this EIR. Accordingly, for the purpose of this EIR, population and housing impacts would be considered significant if the proposed project would:

- Displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere;

## 4.11.3 Issue 1: Displacement

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### 4.11.3.1 Impacts

#### a. Displaced Housing

As part of the proposed project, the existing Mission Valley Village mobile home park would be discontinued and existing tenants would be displaced. Based on a survey conducted for the RIR it was found that 99 of the 119 spaces are currently occupied with tenant-owned coaches, one is owned by the park owner and rented to the park maintenance employee, and 19 are unoccupied. The known population of the park is 78 individuals, although the estimated population is 120 as some tenants did not complete the survey. While the proposed project would displace 99 mobile home units, housing an estimated population of 120 individuals, the existing mobile housing would be replaced with 444 rental condominium units, 20 percent of which would be affordable housing units. Thus, displacement of on-site tenants would not necessitate the construction of new housing elsewhere. The RIR concluded that there is ample housing available in San Diego and other nearby communities for the tenants of the mobile home park comparable to the Mission Valley Village.

#### b. Relocation Assistance

Current tenants of the on-site mobile home park would have several options for relocation which include:

***Relocation to Archstone-Mission Gorge Rental***

In addition to the relocation assistance described above, each displaced tenant would be given a first priority to rent a unit in the proposed development. This priority would be for any unit within the proposed development, provided however, that if a tenant wishes to rent a low-income unit, the tenant must meet the requirements of a low income household in order to qualify and follow the Housing Commission process.

Ten percent of the new dwelling units would be restrictively rented to low-income tenants and an additional 10 percent would be restrictively rented to moderate-income tenants. Thus, an approximate total of 8990 low- and moderate-income rental units would be made available in the community and to the displaced tenants.

**4.11.3.2 Significance of Impacts**

The proposed project would displace 99 mobile home units and an estimated 120 people, but would replace these with construction of 444 dwelling units, with the capacity to house approximately 1,074 persons (based on SANDAG's current/future 2.42 persons per household projection for the Navajo Community Plan area). Therefore, displacement of existing people and housing would not necessitate the construction of replacement housing elsewhere and population and housing impacts would not be significant.

Displaced tenants would be provided relocation assistance that would allow them to either relocate their existing mobile home to other parks within the region or to relocate to comparable rental housing, including on-site within the proposed project, postconstruction. The RIR specifies compensation and assistance for the cost of relocation for displaced tenants. Thus, impacts would be less than significant.

**4.11.3.3 Mitigation, Monitoring, and Reporting**

Impacts would not be significant, and no mitigation would be required.

## 4.12 Geology and Soils

Geocon Incorporated conducted a comprehensive geotechnical investigation of the Archstone – Mission Gorge project area and identified geologic hazards that might adversely impact the proposed development. The Geotechnical Investigation prepared by Geocon, dated May 5, 2008, and a May 28 letter addendum and June 27 letter addendum to the report, are summarized below and included as Appendix N of this EIR.

### 4.12.1 Existing Conditions

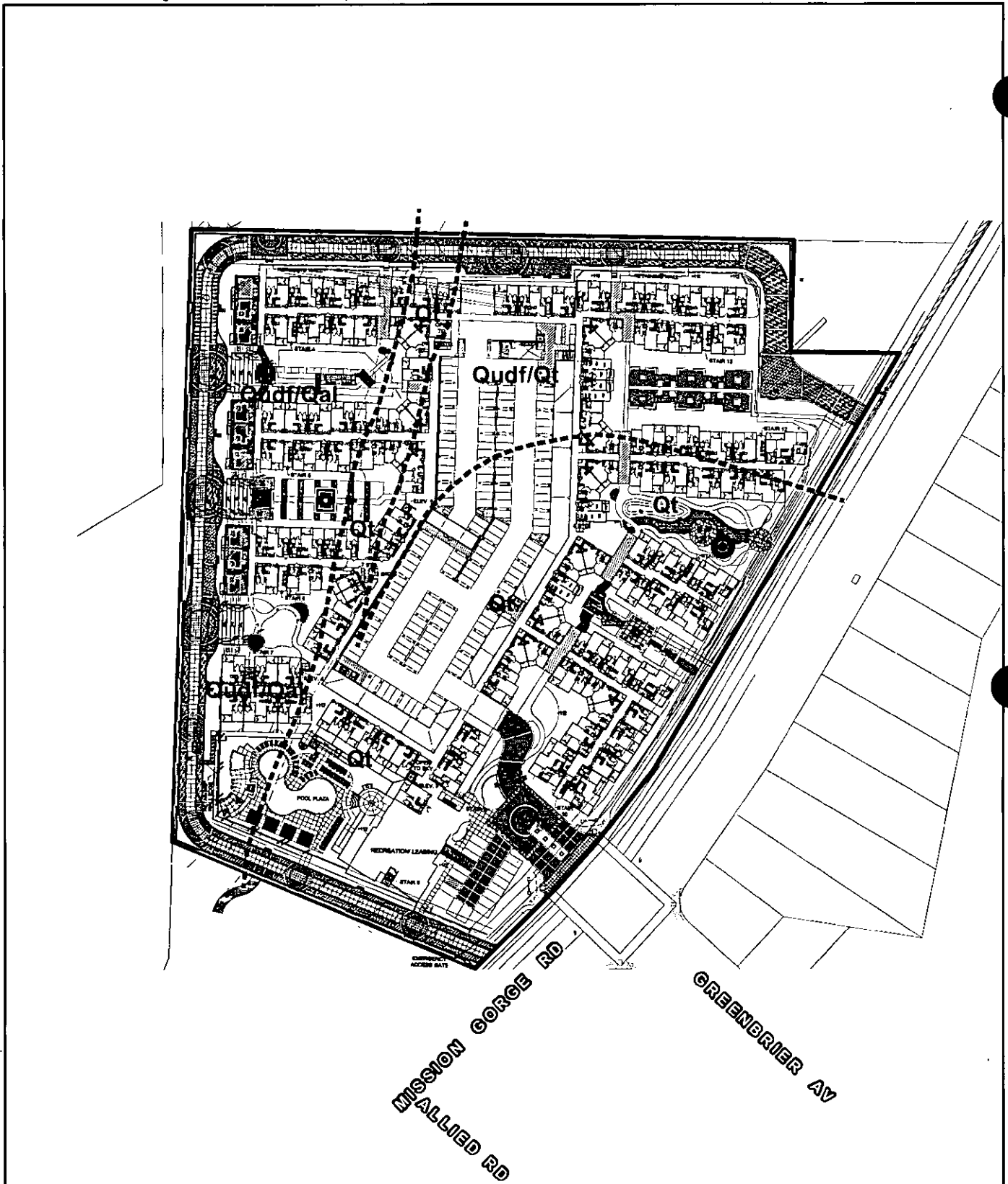
The proposed project site is located in the Peninsular Ranges Geomorphic Province of southwestern California. This province is characterized by southeast-northwest trending ranges and fault zones. The westward tilted ranges are primarily composed of granitic rocks. A sequence of Cretaceous and Tertiary marine and non-marine sediments has been deposited along the coastal margin on the Peninsular Ranges in the San Diego region. A combination of regional uplift and fluctuating sea-level during the Quaternary has resulted in a flight of coastal terraces that have been cut by streams like the San Diego River located west and adjacent to the site.

The proposed project site is located southwest of the mouth of Mission Gorge, where the San Diego River flows through a gap between Cowles Mountain and Fortuna Mountain, which are composed of granitic rocks. Southwest of the gorge, the river has cut through less resistant sedimentary rocks and the canyon broadens to form Mission Valley. The proposed project is situated on the alluvium of Mission Valley and an adjacent elevated stream terrace.

The geotechnical investigation indicates that the project site consists of two distinct levels: an upper larger area at an elevation of approximately 105 feet AMSL and a lower level is at an elevation of approximately 76 feet AMSL. The upper and lower portions of the site are separated by an approximately 2:1 (horizontal:vertical) slope. The proposed project site was apparently graded to construct the mobile home park that currently occupies the site.

#### 4.12.1.1 Geology and Soils

Based on a site reconnaissance and subsurface exploration, Geocon Inc. determined that undocumented fill soils (Qudf), alluvium (Qal), and terrace deposits (Qt) underlie the proposed project site (Figure 4.12-1). Alluvium (stream deposits) is present in the lower portions of the site associated with the San Diego River valley. Terrace deposits (older alluvium) underlie the upper portion of the site along the valley margin.



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 Project Boundary

**Geologic Zones:**

Qal = Alluvium \*

Qt = Terrace Deposits \*

Qudf = Undocumented Fill

\* Blue Font Indicates Buried Soils

0 50 150 Feet 

**FIGURE 4.12-1**

Geologic Map

000470

The alluvium consists of loose to medium dense sand and silty sand. Geocon Inc. reported that very stiff to hard clay occurs below a depth of about 32 feet in the northwest part of the site. In contrast, the terrace deposits consist of dense sand, silty sand, and clayey sand.

Fill soils have been placed over the alluvial soils and terrace deposits in the western and northern part of the site. Apparently, there is no documentation as to the placement and compaction of the fill; hence the geotechnical consultant refers to the fill soil as undocumented fill soils. Geocon, Inc. reports that the fill consists of medium dense clayey to silty sand that is generally less than 3 feet deep, but may be deeper in some areas.

#### **4.12.1.2 Groundwater**

Geocon Inc. reported that groundwater was encountered at depths of approximately 10 to 12 feet within the lower level of the project site, corresponding to approximately the elevation of the adjacent San Diego River. Groundwater elevations in the eastern part of the site, below the upper level of the project site were not encountered but are expected to be below the lower pad elevation.

#### **4.12.1.4 Geologic Hazards**

The project site is located within Geologic Hazard Categories 31 and 53 as shown on the City's Seismic Safety Study maps. Zone 31 encompasses areas with a high liquefaction potential. Zone 53 is characterized as level or sloping terrain, unfavorable geologic structure, and moderate risk of geologic hazards.

##### **a. Faulting and Seismicity**

The proposed project site is not located in an Alquist-Priolo Earthquake Fault-Rupture Hazard Zone or in a City special fault study zone or fault bluff zone. The nearest known active fault is the Rose Canyon fault, located about 6½ miles west of the site. The geotechnical report indicates that the site could be subjected to moderate to severe ground shaking in the event of an earthquake originating on the Rose Canyon fault or other regional faults.

##### **b. Liquefaction/Seismic Settlement**

The geotechnical investigation indicated that alluvial soils beneath the site have the potential to liquefy during an earthquake. According to the Geocon Inc. report, liquefaction occurs within relatively loose, cohesionless sand located below the water table that is subjected to ground accelerations from earthquakes. Total settlement of up to 6½ -inches and lateral displacements towards the river of up to 1 foot would be expected manifestations of liquefaction at this site.

## **b. Landslides**

No landslides are present on the property or at a location that could impact the proposed project site, based on the evaluation by Geocon Inc.

## **c. Tsunamis and Seiches**

A tsunami is a long-wavelength sea wave that may be produced by a large scale, short duration disturbance of the ocean floor. Tsunamis can cause significant damage along an exposed coast. The potential for inundation at the proposed project site due to tsunami is considered low by Geocon Inc. due to the distance and elevation of the site with respect to the Pacific Ocean located 9 miles away.

A seiche is a sudden rise in water level resulting from standing wave oscillation of the water surface of an enclosed basin that can be caused by earthquake ground shaking. Geocon Inc. indicates that there is a potential for inundation at the site if a seiche resulted in overtopping San Vicente Dam; however, they deem this potential to be low. An earthquake-induced seiche in the small shallow lakes along the San Diego River may pose a scour risk to the proposed project.

## **4.12.2 Significance Determination Thresholds**

Based on the City's January 2007 Significance Determination Thresholds, impacts related to geology and soils would be significant if the proposed project would:

- Expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards;
- Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project; and/or
- Potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapses;
- Result in a substantial increase in wind or water erosion of soils, either on- or off-site.

## **4.12.3 Issue 1: Geologic Hazards**

Would the proposed project expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards? Would the proposed project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

### 4.12.3.1 Impacts

Geologic hazards that may impact the site are related to earthquake induced strong ground shaking and secondary effects. These secondary effects include liquefaction and potential flooding or scour related to seiche.

#### a. Compressible Soils

Some of the soil types found on the project site are not suitable for the support of structures and therefore would expose people to hazards. Undocumented fill is considered unsuitable for the support of settlement-sensitive structures. Alluvium is susceptible to liquefaction and is considered unsuitable for the support of settlement-sensitive structures. Terrace deposits are considered suitable for the support of settlement-sensitive structures. Removal and recompaction of the undocumented fill and alluvium are standard grading techniques required by the California Building Code (CBC) and are included as recommendations in the project geotechnical report. Adherence to these requirements would ensure that impacts associated with compressible soils would be less than significant.

#### b. Groundwater

Groundwater was encountered in the lower elevation portion of the project site at depths of approximately 10 to 12 feet. Groundwater or seepage conditions have the potential to develop in areas where none currently exist. Engineering design for proper surface drainage of irrigation and rain water would ensure that impacts are less than significant.

#### c. Faults/Earthquake Ground Motion

The project site is considered in a low/moderate risk hazard zone. While the site is located in a seismically active area, no particular characteristic of the site indicates an unusual or heightened seismic risk. The site is not in a mapped Alquist-Priolo Earthquake Fault Zone and is not crossed by a fault. Construction would be required to comply with Uniform Building Code regulations. Proper engineering design of all new structures would ensure that the potential for earthquake hazards would be less than significant.

#### d. Liquefaction/Seismic Settlement

As discussed above, the proposed project site is subject to liquefaction. At the lower elevations of the project site, liquefaction may occur within the alluvial deposits at depths of 10 to 30 feet below the ground surface. Liquefaction hazards would be potentially significant.

**e. Landslides**

As discussed above, there are no landslides at the project site or in a location that could impact the project site. Landslide hazards would be less than significant.

**f. Tsunamis and Seiches**

*The potential for the proposed project to be affected by a tsunami would be low. The potential for overflow of the San Vicente Dam would be low. However, in the event of an earthquake, the proposed western perimeter wall may potentially be flooded by small lakes located adjacent to the San Diego River.*

**4.12.3.2 Significance of Impacts**

The project site contains geologic conditions, including compressible soils and *liquefaction, which would pose significant risks if not properly treated. The geotechnical investigation sets forth specific mitigation measures and design considerations that must be implemented in order to reduce liquefaction impacts to below a level of significance.*

**4.12.3.3 Mitigation, Monitoring, and Reporting****a. Compressible Soils**

Project engineering design includes the removal and recompaction of on-site alluvium and undocumented fill in accordance with the CBC and recommendations of the project geotechnical report. Adherence to these requirements would ensure that impacts associated with compressible soils would not be significant and no mitigation would be required.

**b. Groundwater**

Engineering design, in accordance with the CBC, for proper surface drainage of irrigation and rain water would ensure that impacts would be not significant. Thus, no mitigation would be required.

**c. Faults/Earthquake Ground Motion**

The impact to the proposed buildings from strong ground shaking due to earthquakes on regional faults would be reduced to an acceptable level by adherence to the California Building Code.

**d. Liquefaction/Seismic Settlement**

Geocon Inc. recommends remedial grading and ground improvement to reduce the potential impacts associated with earthquake induced soil liquefaction. Ground

improvement may include stone columns, vibro-compaction, or compaction grouting. The consultant recommends removal of the alluvial soil to a depth of 3 feet above groundwater in the lower pad area outside the area of planned ground improvement. Potential impacts due to liquefaction would be reduced to an acceptable level of risk as a condition of the Site Development Permit and adherence to the California Building Code and the Seismic Mapping Act.

#### **e. Landslides**

Landslide hazards are less than significant and no mitigation would be required.

#### **f. Tsunamis and Seiches**

Geocon Inc. indicates that the potential for inundation of the site to be affected by a tsunami or seiche is low and mitigation measures have not been recommended..

### **4.12.3.4 Significance of Impacts After Mitigation**

Implementation of the mitigation measures outlined above for liquefaction and seismic settlement would reduce geologic hazard impacts to a level that is less than significant.

## **4.12.4 Issue 2: Soil Erosion**

Would the project increase the potential for erosion of soils on- or off-site?

### **4.12.4.1 Impacts**

Development of the project site would include grading activities which remove the existing pavement and cover, thereby exposing soils to potential runoff and erosion. The *City of San Diego Municipal Code's Grading Regulations* require extensive measures to control erosion during and after grading or construction such as:

- Desilting basins, improved surface drainage, or planting of ground covers required early in the improvement process in areas that have been stripped of native vegetation or areas of fill material;
- Short-term measures such as sandbag placement and temporary detention basins;
- Catch basins;
- Restrictions on grading during the rainy season (November through March), depending on size of the grading operation, and on grading in proximity to sensitive wildlife habitat; and

- Immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season.

Conformance to such mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Recommendations described in the geotechnical investigation (see Appendix N) and incorporated into project grading design would additionally serve to avoid potential soil erosion impacts.

#### **4.12.4.2 Significance of Impacts**

Adherence to the City of San Diego Municipal Code grading regulations and construction requirements, California Building Code, Seismic Hazards Mapping Act, and implementation of the recommendations described in the geotechnical investigation (see Appendix N) would preclude significant erosion and geologic impacts.

#### **4.12.4.3 Mitigation, Monitoring, and Reporting**

Compliance with the grading ordinance and geotechnical report would ensure that erosion and geologic impacts would be below a level of significance; therefore, no mitigation is required.

#### **4.12.5 Conclusion**

Implementation of the recommendations described in the geotechnical investigation (see Appendix N) would reduce geological impacts to below a level of significance. Potential geologic impacts could be reduced to an acceptable level of risk by adherence to the San Diego Municipal Code, California Building Code, Seismic Hazard Mapping Act, and implementation of proper engineering design as recommended in the geotechnical investigation.

## 4.13 Public Services

Public services are those functions that serve residents on a community-wide basis. These functions include fire and police protection, emergency medical services, public schools, libraries, and public recreational facilities and parks. The following provides a discussion of these services and facilities as they relate to the proposed project. This section is based on letters prepared by the service providers which are included in Appendix B of this EIR.

### 4.13.1 Existing Conditions

#### 4.13.1.1 Fire Protection

Existing conditions for fire-rescue services are included under Section 2.5.1.1 in the Environmental Setting. As discussed in that section, Fire Station 45 would provide primary fire protection and advanced life support services to the proposed project. Three additional fire stations would also serve the proposed project. All of the fire stations that would serve the proposed project would meet the national standards for initial response or effective fire force.

#### 4.13.1.2 Police Protection

Existing conditions for police protection services are included under Section 2.5.1.3 in the Environmental Setting. As discussed, the goal citywide is to maintain 1.67 officers per 1,000 population ratio; however the current budgeted staffing ration is 1.59 officers per 1,000 residents. The average response times for the project area beat, Beat 322, currently exceeds the citywide average and Police Department goals for emergency and priority one calls, but are less than the citywide average and goal response times for priority two, three, and four calls.

#### 4.13.1.3 Schools

The Archstone – Mission Gorge project site is located within the jurisdiction of the San Diego Unified School District (SDUSD). The SDUSD provides public educational facilities to the project area via one high school, one middle school, and one elementary school. These include:

- Foster Elementary School is located at 6550 51<sup>st</sup> Street, approximately 0.6 mile southeast of the project site;
- Lewis Middle School is located at 5170 Greenbrier Avenue, approximately 0.8 mile east of the project site; and

- Patrick Henry High School is located at 6702 Wandermere Drive, approximately 2.4 miles east of the project site, south of Navajo Road and west of Park.

Table 4.13-1 below depicts the current enrollment, capacity, and enrollment trend at each of the schools serving the project site. As shown, the current enrollments at each of the schools are below capacity; Lewis Middle School and Henry High School are nearing capacity.

**TABLE 4.13-1**  
**CURRENT SCHOOL ENROLLMENT AND CAPACITY**

School	Current Enrollment	Current Capacity	Future Enrollment (trend)
Foster (K-5)	425	506	Falling
Lewis (6-8)	1,052	1,078	Stable/rising
Henry (9-12)	2,438	2,450	Stable/rising

SOURCE: San Diego Unified School District, personal communication March 5, 2008.

When additional demand warrants, the provision of school facilities is the responsibility of the SDUSD. Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development as a method of addressing increased enrollment resulting from that development. State Senate Bill 50 (SB 50) significantly revised developed fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation holds that the statutory fees are the exclusive means of considering and mitigating school impacts. SB 50 limits the mitigation that may be required to the scope of the review of a project's impacts to schools, and the findings for school impacts. Payment of the statutory fee would mitigate the impact because of the provision that the statutory fees constitute full and complete mitigation.

#### 4.13.1.4 Parks

The City of San Diego park and recreation system includes population-based parks, resource-based, and open space parks. Population-based parks and facilities are intended to serve the immediately surrounding residential population. Population-based parks are further divided into neighborhood parks and community parks depending on acreage and the number of residents served. Resource-based parks are located at the site of distinctive scenic or natural or cultural features and are intended for citywide use. Where appropriate, they may be developed with amenities intended to enhance the feature or resource. Open space parks are city-owned lands consisting of canyons, mesas, or other natural landforms. They are intended to preserve and protect biological resources, while providing access and use through hiking, biking, and equestrian trails.

Currently, the Navajo community has three community parks and six neighborhood parks (see Table 4.13-2 below), as well as a number of existing and future planned joint-use-school parks.

**TABLE 4.13-2  
POPULATION –BASED PARKS BY CLASSIFICATION**

Park	Useable Acreage	Distance to Project Site
<b>Community Parks</b>		
Allied Gardens	13.35	0.6 mile
Lake Murray	41.86	2.6 miles
San Carlos	9.14	4.1 miles
<b>Neighborhood Parks</b>		
Dailard	3.30	2.3 miles
Grantville	2.28	0.7 mile
Princess Del Cerro	4.38	1.6 miles
Rancho Mission Canyon	9.42	1.6 miles
San Carlos Pocket Park	0.29	--
Tuxedo	5.62	2.8 miles

SOURCE: City of San Diego, City Planning and Community Investment, Park Planning Section, personal communication with Jeffrey Harkness, Park Designer, January 16, 2008.

The NCP area had a deficit in population-based park acreage of 17.09 in 2006 and a projected deficit of 1.42 acres in 2030.

In addition, two regional resource-based parks are located near the project site. The San Diego River Park borders the project site on the west. Bicycle and pedestrian trails exist or are planned along the San Diego River corridor. The 5,800-acre Mission Trails Regional Park is located northeast of the project site, its western edge approximately three miles from the project site. Mission Trails offers a broad variety of recreational opportunities, including hiking, camping, fishing, and biking and horseback riding trails.

#### **4.13.1.5 Libraries**

The Archstone – Mission Gorge project site is located in the service area of the City of San Diego Library System. The City operates a central library located in downtown San Diego and 35 branch libraries in neighborhoods throughout the City. The General Plan, contains policies to develop a central library to serve as the major resource and to design all branch libraries with a minimum of 15,000 square feet of dedicated library space, with adjustments for community-specific needs. Currently, only the Mission Valley branch meets this standard.

The nearest library to the project site is the Benjamin Branch Library located at 5188 Zion Avenue, approximately 0.8 mile east of the project site. The library is 6,900 square feet in size and houses approximately 50,000 items (books, paperbacks, DVDs, CDs, etc.). According to City library analysts, the service area for the Benjamin branch library

includes census tracts 96.02, 96.04, 97.07, and 97.05, which account for an approximately one-mile radius service area and population of 13,664 (personal communication with Mary Tilotta, Library CIP Analyst, January 17, 2008). Other libraries in the project area include the Mission Valley and San Carlos branch.

### **4.13.2 Significance Determination Thresholds**

Based on the City's significance thresholds, impacts related to public services would be significant if the proposed project would:

- Have an effect upon, or result in a need for new or modified governmental services.

### **4.13.3 Issue 1: Public Services**

Would the proposed project have an effect upon, or result in a need for new or modified governmental services. These include fire protection, police protection, schools, parks or other recreational facilities, or libraries?

#### **4.13.3.1 Impacts**

For the purposes of determining the worst-case analysis of impacts to public services, San Diego Association of Governments (SANDAG's) 2007 calculation of 2.42 people per household within the NCP area was used. This calculation would apply to fire, police, parks and recreation and library services. Student generation for schools is based on a rate developed by the SDUSD. Based on the SANDAG household size, the proposed project would result in a maximum increase of 325 units, resulting in a population increase of 787.

##### **a. Fire Protection**

Compared to existing conditions, the Archstone – Mission Gorge project would likely increase the call volume for the engine companies responsible for the project area due to increased population and housing provided on-site. In accordance with fire department standards, an increase of 1,000 citizens would equal 72.5 responses. It is therefore estimated that the proposed project would increase run volume per year for Station 45 by 64.5 calls (Frankie Murphy, City Fire Marshall, personal communication, May 2008). As addressed above, the fire stations that serve the project site would not exceed the national standards for initial response or effective fire force. Therefore, the project would not result in the need for a new or modified fire station. The project applicant would make payment of required DIFs in accordance with the PFFP for the Navajo community. Thus, the proposed project would not have a significant impact on fire protection services.

### b. Police Protection

The addition housing and population of the proposed project would result in additional demand for police service in Beat 322. Without additional officers, it is likely that police response times will increase in the project area. The police department has determined that two additional police officers would be needed to attain the desired ratio of 1.67 officers to 1,000 residents. While the proposed project would not result in a physical impact due to the need for new or modified facilities, the applicant would compensate for the initial costs of providing two additional officers to offset the effect on police response time. Initial costs associated with increased police officer staffing include the following: expansion to existing police facilities (when necessary), police vehicles, portable radios, firearms, and other related safety equipment. This one-time, start-up amount totals \$14,000 per sworn officer. Salaries and other employee benefits are not included in this figure. The proposed project would therefore provide compensation in the amount of \$28,000 for the two additional police officers and related equipment assigned to the Department, to be consistent with optimal staffing requirements. Thus, impacts to police protection services would not be significant.

### c. Schools

The number of students per unit in multi-family developments within the SDUSD varies widely depending on unit sizes, proximity to schools, rent, density, target market, and specific amenities. SDUSD attempts to identify comparable existing developments in order to estimate the potential number of students generated from new development. The SDUSD determined generation rates for the proposed project based on the average of a number of apartment complexes with 100 or more units in the project vicinity. Table 4.13-3 below illustrates the estimated range for student generation for the proposed project as provided by SDUSD.

**TABLE 4.13-3  
POTENTIAL STUDENT GENERATION**

School Level	Students per Unit	Number of Students
K-5	0.019 – 0.130	8 – 58
6-8	0.010 – 0.053	4 – 24
9-12	0.011 – 0.058	5 – 26
K-12 Total	0.040 – 0.241	17 – 108

Using the worst-case estimate in Table 4.13-3, the proposed project would generate 58 elementary students, 24 middle school students student, and 26 high school students. Based on these numbers, the proposed project has the potential to impact district schools at the middle and high school level as Lewis Middle School and Henry High are nearing capacity as shown in Table 4.13-1.

When additional demand warrants, the provision of school facilities would be the responsibility of the SDUSD. The applicant would pay statutory school fees to accommodate the needs of public schools in the community. Pursuant to SB 50, enacted in August 1998, the payment of these state-mandated school fees would constitute full and complete mitigation and no significant impacts would result.

#### **d. Parks**

The proposed project would result in an increase in the number of residential units and would thus place additional demand on park and recreation services. Based on the General Plan guidelines, a total requirement of 2.25 useable acres of population-based public parks would apply to the proposed project (communication with Jeff Harkness, City Park Planning, January 16, 2008). Since no public population-based park acreage are proposed as part of the project, the applicant will pay a per-unit DIF at the time of building permit issuance to support the provision of park and recreation facilities for the community at buildout. Therefore, the proposed project would not result in the need for new or modified services and there would be no significant impacts.

#### **e. Libraries**

The proposed project would add new residents and would increase demand on the Benjamin Branch Library. This project, however, would not result in the need for new or modified library facilities. With payment of the required DIF, there would be no significant impacts to library service.

### **4.13.3.2 Significance of Impacts**

#### **a. Fire Protection**

The proposed project would increase the call volume for the engine companies assigned to the project area. However, payment of required DIFs in accordance with the PFFP for the Navajo community would ensure that impacts to fire protection services would be less than significant.

#### **b. Police Protection**

The increase in population based on the proposed project would result in a need for two additional police officers in order for the Police Department to attain the standard ration of 1.67 officers to 1,000 residents. No new facilities would be required and the project would contribute the start-up costs with the two additional officers needed to maintain the response time goals; thus, there would be no significant impacts to police protection services.

**c. Schools**

The proposed project would generate new students who will attend area schools which are near capacity (Lewis Middle School and Henry High School). Payment of school fees consistent with the provisions of SB 50 would ensure that potential impacts to schools would be less than significant.

**d. Parks**

The proposed project would add to the demand for park and recreation in the community. Payment of the per-unit DIF would ensure that the proposed project would have a less than significant impact on the Navajo community park and recreation facilities.

**e. Libraries**

The incremental demand placed on library services would not be a significant impact as the existing branch libraries are adequate to service the proposed project's residents. The proposed project would pay the required development impact fees which would ensure that impacts are less than significant.

**4.13.3.3 Mitigation, Monitoring, and Reporting****a. Fire Protection**

Impacts to fire protection services would be less than significant; thus, no mitigation would be required. Payment of required DIF fees in accordance with the PFFP for the Navajo community is a standard requirement of the proposed project.

**b. Police Protection**

Impacts to police protection services would be less than significant, thus no mitigation would be required. The project would contribute the start-up costs with the two additional officers needed to maintain the response time goals.

**c. Schools**

Impacts to schools would be less than significant; thus, no mitigation would be required. Payment of required school fees in accordance with SB 50 is a standard requirement of the proposed project.

**d. Parks**

Impacts to park and recreation services would be less than significant; thus, no mitigation would be required. Payment of required DIF fees in accordance with the PFFP for the Navajo community is a standard requirement of the proposed project.

**e. Libraries**

Impacts to library service would be less than significant; thus, no mitigation would be required. Payment of required DIF fees in accordance with the PFFP for the Navajo community is a standard requirement of the proposed project.

## 4.14 Public Health and Safety/Hazardous Materials

The potential for hazardous materials affecting public health and safety within the Archstone – Mission Gorge project area was evaluated in a Phase I Environmental Site Assessment (ESA) prepared by Blackstone Consulting in late 2006, attached as Appendix O to this EIR. The investigation included a review of regulatory agency databases, records review, limited visual site reconnaissance, and review of site history to identify potential environmental concerns.

### 4.14.1 Existing Conditions

#### 4.14.1.1 Federal, State, and Regional Regulations

Numerous federal, state, and local laws and regulations regarding hazardous materials have been developed with the intent of protecting public health, the environment, surface water, and groundwater resources. Over the years, the laws and regulations have evolved to deal with different aspects of the handling, treatment, storage, and disposal of hazardous substances. Relevant laws and regulations include:

- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, also known as “Superfund,” and the Superfund Amendments and Reauthorization Act (SARA) of 1986 (amended CERCLA, SARA Title III). CERCLA, SARA Title III provide a federal framework for setting priorities for cleanup of hazardous substances releases to air, water, and land. This framework provides for the regulation of the cleanup process, cost recovery, response planning, and communication standards.
- Federal Resource Conservation and Recovery Act (RCRA) of 1976. This act established the authority of the EPA to develop regulations to track and control hazardous substances from their production, through their use, to their disposal.
- The California Division of Occupational Safety and Health Administration (OSHA) and federal OSHA define and enforce worker safety standards and require proper handling and disposal of hazardous materials according to OSHA and EPA and regulations.

#### 4.14.1.2 Regulatory Listings

Regulatory agency records pertaining to the site were searched by Blackstone Consulting for preparation of the Phase I ESA and it was concluded that there are no recognized environmental conditions (RECs) in conjunction with the project site.

### **4.14.1.3 Asbestos Containing Materials (ACM)**

Occupational Safety and Health Administration (OSHA) regulations require property owners to identify presumed ACM (PACM) in properties constructed prior to 1981. Based on the date of construction of the project site buildings (1959), and inability to sample and evaluate the observed materials, these regulations apply.

Frequently encountered types of ACM used in building construction include floor tile and mastic, spray-applied fireproofing, acoustical/decorative ceiling plaster, wallboard and joint compound, insulation, and many other building materials in common use prior to 1981. Materials which contain over one percent asbestos fibers are considered regulated ACM and must be handled according to EPA and OSHA regulations.

### **4.14.2 Significance Criteria**

Based on the City's significance thresholds, impacts associated with hazardous materials/public safety would be significant if:

- The proposed project is on or near known contamination sources.

### **4.14.3 Issue 1**

Would the proposed project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?

#### **4.14.3.1 Impacts**

##### **a. Hazardous Materials Sites**

As the project site is in an area developed with residential, commercial, and industrial uses, a Phase I ESA was undertaken to determine whether there are any known contaminations sources on- or off-site. The Phase I ESA concluded that there are no recognized environmental conditions (RECs) in conjunction with the site; and the implementation of the proposed project would not involve any significant hazards related to known hazardous materials sites.

##### **b. Asbestos Containing Materials (ACM)**

Demolition of the existing buildings on-site could expose personnel to asbestos and/or lead-based paint. The Phase I investigation indicates that there is a potential for ACM to be found within drywall, drywall joint compound, and linoleum flooring found in various locations around the site. Potential risks arising from asbestos exposure would be avoided through mandatory compliance with the National Emissions Standards for

Hazardous Air Pollutants (NESHAPs), OSHA, and other applicable state and local regulations that require proper handling and disposal of hazardous ACM. Prior to the commencement of demolition/removal activities, a predemolition survey would be performed, and during demolition/removal activities building materials would be properly handled, in accordance with the NESHAPs, OSHA, and other regulations to ensure that no significant impacts would occur.

### **c. Lead-Based Paint (LBP)**

Based on the age of the existing site buildings, there is a potential for the presence of lead-based paint (LBP) at the site. Applicable federal, state, and local lead-based paint regulations would be adhered to during demolition. These regulations do not typically require sampling, but rather the use of proper dust suppression techniques during demolition as commonly stipulated in building demolition permits. Should the selected solid waste disposal facility or recycling facility require that suspected lead-based paint debris be analyzed using toxicity characteristics leaching procedure, the actual building materials designated for that facility would require analysis at that time.

Project compliance with mandatory federal, state, and local lead-based paint regulations, including implementation of proper handling, dust suppression, and disposal techniques during demolition, would ensure that potential LBP impacts would not be significant.

## **4.14.3.2 Significance of Impacts**

The Phase I ESA concluded that there are no RECs in conjunction with the site and that implementation of the proposed project would not involve any hazards except during demolition. During demolition there would be a potential for personnel to be exposed to asbestos and/or lead-based paint. Project compliance with all mandatory standards and regulations pertaining to ACM and LBP presurvey, handling, dust-suppression, and disposal would ensure that ACM and LBP impacts would not be significant.

## **4.14.3.3 Mitigation**

### **a. Asbestos Containing Materials**

Potential risks arising from asbestos exposure would be avoided through mandatory compliance with the NESHAPs, OSHA, and other applicable state and local regulations that require proper handling and disposal of hazardous ACM. Therefore, impacts would not be significant and no mitigation would be required.

### **b. Lead-Based Paint**

Project compliance with mandatory applicable federal, state, and local lead-based paint regulations, including implementation of proper handling, dust suppression, and disposal

techniques during demolition, would ensure that potential LBP impacts would not be significant. No mitigation is required.

## **5.0 Significant Unavoidable Environmental Effects/Irreversible Changes**

CEQA Guidelines Section 15126.2 (b) and (c) require that the significant unavoidable impacts of the proposed project, as well as any significant irreversible environmental changes that would result from project implementation, be addressed in the project EIR.

### **5.1 Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented**

In accordance with CEQA Guidelines Section 15126.2 (b) any significant unavoidable impacts of a proposed project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant's willingness to implement all *feasible mitigation measures*, must be identified in the EIR. Traffic/circulation (cumulative roadway impacts) are significant unavoidable impacts of the proposed project. All other significant impacts identified in Section 4.0 of this EIR as resulting from project implementation can be reduced to below a level of significance with the mitigation measures identified in Section 4.0 and in the Mitigation Monitoring and Reporting Program (MMRP, Section 10.0).

### **5.2 Irreversible Environmental Changes Which Would Result if the Project Is Implemented**

In accordance with CEQA Guidelines Section 15126.2 (c): "Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

Nonrenewable resources generally include biological habitat, agricultural land, mineral deposits, water bodies, and some energy sources. As evaluated in Sections 4.7 and 8.0 of this EIR, implementation of the proposed project would not result in significant irreversible impacts to biological, agricultural, or mineral resources. Implementation of

## 5.0 Significant Unavoidable Environmental Effects/Irreversible Changes

the proposed project would, however, require the irreversible consumption of natural resources and energy. Natural resource consumption would include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials, while perhaps recyclable in part at some long-term future date, would for practical purposes be considered permanently consumed. Energy derived from non-renewable sources, such as fossil and nuclear fuels, would be consumed during construction and operational lighting, heating, cooling, and transportation uses.

To minimize the use of energy, water, and other natural resources, the proposed project has incorporated sustainable building practices into its site and architectural and landscape design. As described in Section 3.6.2 of this EIR, design considerations aimed at improving energy efficiency and reducing water use have been incorporated into the project design and may serve to reduce irreversible water, energy, and building materials consumption associated with construction and occupation of the proposed development.

## 6.0 Growth Inducement

CEQA Guidelines Section 15126.2(d) requires that an EIR "discuss ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included are projects which would remove obstacles to population growth (for example, a major expansion of a waste water treatment plant might allow for more construction in service areas). Increases in the population might tax existing community services facilities; requiring construction of new facilities that could cause significant environmental effects." Also, "It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

The City's 2007 Significance Determination Thresholds provide further guidance to determine potential significance for growth inducement. Based on the Thresholds, a significant impact could occur if a project would "induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment."

### 6.1 Population and Growth Projections

According to current SANDAG estimates, in 2007 the Navajo Community Plan Area had a population of 49,546 individuals, and a total of 20,573 housing units, resulting in an average of 2.42 persons per household.

The Archstone – Mission Gorge project would increase the housing stock in the Navajo Community Plan area by 444 units, representing a two percent increase. Based on SANDAG's current estimate of 2.42 persons per household, the project would also result in an approximate two percent increase in population, adding 1,074 new residents to the community. However, since the project site contains an existing housing stock of 99 and population of approximately 120, the total gains in housing stock and population could be less provided some of the current on-site mobile home tenants relocate to the proposed new on-site housing. Regardless, anticipated increases in population and housing stock would not be substantial. Although the project would produce increased demand for police, fire department, and sewer services, these anticipated increases would not significantly tax existing community services facilities or require construction of new facilities that would cause significant environmental effects. The proposed project density and total dwelling unit count is allowed by the current land use designation of the Navajo Community Plan and City zoning and is therefore accounted for in SANDAG's long range Series 7 population projections as well as the City's public infrastructure planning program.

## 6.2 Development Features

The project proposes a land use intensity that is in conformance with densities allowed in the existing zoning and underlying community plan land use designation for the project site. The proposed project is also consistent with existing surrounding development patterns and with City and regional housing and smart growth goals. As stated in the City's Housing and Strategic Framework elements and SANDAG's Regional Housing Element, population growth should be concentrated within compact village centers within already developed areas, thereby reducing the potential for significant environmental impacts caused by development sprawl.

The project proposes a medium-high density residential development in a location already served by public infrastructure and transit. Because the proposed project is located in an already urbanized area, project implementation would not remove obstacles to population growth through construction of new roads or public infrastructure to areas not currently accessible to development.

The dense, compact nature of the proposed development would promote walkability, greater transportation efficiency, and conserve land. Pedestrian walkways incorporated into the project design would allow connectivity to the nearby church, bank, supermarket, and restaurants and to the adjacent and nearby public transit (bus and trolley) service on Mission Gorge Road. Because the proposed project is located on a site currently served by existing water and wastewater infrastructure, project implementation would avoid the environmental effects caused by sprawl into areas without existing infrastructure, as well as conserve natural and financial resources required for construction and maintenance of infrastructure.

## 7.0 Cumulative Impacts

Section 15130(a) of the State CEQA Guidelines requires a discussion of cumulative impacts of a project "when the project's incremental effect is cumulatively considerable." Cumulatively considerable, as defined in Section 15065(c), "means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." According to Section 15130 of the CEQA Guidelines, the discussion of cumulative effects "need not be provided as great detail as is provided the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness."

The following evaluation of cumulative impacts considers both existing and future projects in the Archstone – Mission Gorge project vicinity. For this evaluation, the project vicinity is defined as the community of Navajo, bordered by Tierrasanta to the north and Serra Mesa and east Mission Valley to the west. According to Section 15130(b)(1) of the CEQA Guidelines, the discussion of cumulative effects is to be on either (a) "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency," or (b) "a summary of projections contained in an adopted plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency."

The basis and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue. For this analysis, where evaluation of potential cumulative impacts are localized (e.g., noise, traffic, public utilities), a list of project methods was employed. For potential cumulative impacts that are more regional in scope (e.g., air quality, global warming, biological, and cultural resources), planning documents were additionally used in the analysis.

### List of Projects Considered for Cumulative Analysis

Table 7-1 shows the past, present, and probable future projects considered in this cumulative effects evaluation:

**TABLE 7-1  
LIST OF PROJECTS IN VICINITY USED TO EVALUATE CUMULATIVE EFFECTS**

Project Name/Location	Type/Description	Status/Environmental Review
1) Fashion Walk 7148 Friars Road (LDR No. 99-1356; PTS No. 4301)	Multi-family Residential 161 du (condominiums)	Under Construction. MND completed January 2004. Mitigation measures were required to reduce impacts associated with biology, geology, noise, traffic, and paleontology to below a level of significance.
2) Murray Canyon Apts. (Project No. 5700)	Multi-family Residential 268 du (apartments)	Under Construction. MND completed April 2005. Mitigation measures were required to reduce impacts associated with air quality, noise, traffic/circulation/ parking, utilities (solid waste), and paleontology to below a level of significance.
3) River Walk Commercial Center northwest corner of Fashion Valley Road and Riverwalk Drive	Health Club/Office/ Restaurant 61,000 sf	Currently on hold. Involves a Rezone, PDP, SDP, Design Guidelines for Development Area 2, and street vacation. Is part of the Levi-Cushman Specific Plan.
4) Levi Cushman Specific Plan	Mixed-Use	
5) Mission Valley Heights (Project No. 2052; LDR No. 41-100)	Commercial	Fully Constructed. Involves a PDP, amendment to approved PCD, and amendment to approved Mission Valley Heights Specific Plan to allow a change in planned land uses from 8,800 sf of restaurant to 26,000 sf of commercial office use. MND completed September 2002. Mitigation measures, including implementation of BMPs during construction and post-construction, were required to mitigate significant impacts to hydrology and water quality.
6) Rio Vista West north of San Diego River, south of Friars Road, east of Qualcomm Way, west of Mission Center Drive.	Mixed-Use including 237 attached du	Fully Constructed. Environmental review for Rio Vista West Project, was in the form of an Addendum to EIR No. 92-0586.

**TABLE 7-1**  
**LIST OF PROJECTS IN VICINITY USED TO EVALUATE CUMULATIVE EFFECTS**  
**(continued)**

Project Name/Location	Type/Description	Status/Environmental Review
7) Presidio View 1450 Hotel Circle North (LDR No. 99-0348; SCH No. 2000000061060)	Multi-family Residential 350 du (apartments)	Fully constructed. Project involved a CPA/GPA, density transfer, Rezone, and Mission Valley Planned Development Ordinance Permit. MND completed September 2000. Mitigation measures were implemented to reduce significant impacts associated with historical resources, traffic, and water quality to below a level of significance.
8) Fenton Residential	Residential	Fully Constructed
9) Morena Vista located in the Linda Vista community (Project No. 6137; SCH 2003061131)	Mixed-Use	Fully Constructed. MND completed October 2003. Project involved a PDP/SDP and variance, Joint Parking Agreement, TM, ESL Deviation, street vacation, street dedication, and easement vacation. Mitigation measures were implemented to reduce impacts to hydrology/water quality, and human health/public safety to below a level of significance.
10) Mission Valley YMCA 5505 Friars Road (Project No. 5501; SCH No. 2003061027)	Commercial	Involved a SDP/CUP and MHPA Boundary Adjustment for City owned property leased to YMCA; to redevelop existing commercial recreation facility. MND included mitigation measures for air quality, visual quality, biology, MHPA adjacency issues, historical resources (archaeology), paleontology, geology/soils, traffic/circulation/parking, and utilities (solid waste).
11) Rio Vista East Lot 4 north of Rio San Diego Drive, east of Rio Bonito, south of Friars Road, west of I-805	Commercial	Fully Constructed. Involved an amendment to approved PCD to allow Lot 4 to be developed with 350,000 sf of general office uses where the original PCD allowed 92,000 sf of general office and 41,000 sf of research and development uses. ND completed May 1999 addressed land use, neighborhood character, aesthetics, transportation/circulation, and public services. No significant impacts were identified.

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**TABLE 7-1**  
**LIST OF PROJECTS IN VICINITY USED TO EVALUATE CUMULATIVE EFFECTS**  
**(continued)**

Project Name/Location	Type/Description	Status/Environmental Review
12) Cabrillo Military Housing Located in Serra Mesa	Residential 900 du	Fully Constructed. Completed by the US Department of the Navy. Replaced an existing 882-housing units with 900 housing units.
13) Mission Valley Fire Station 9366 Friars Road (Project No. 6595; LDR No. 330900; CIP No. 33-090.0)	Civic (fire station #45) 16,290 sf and public mini-park	Involves the construction of a new two-story fire station in Mission Valley. MND completed April 2004. Mitigation measures included constructing a block wall at the toe of an on-site manufactured slope, opening a concrete median barrier, and installing a traffic signal for emergency use on Friars Road.
14) Centerpointe at Grantville 6160 Mission Gorge Road, within the Navajo Community Plan area (PTS No. 80450)	Mixed Use, to include 588 Multi-family Residential du and 135,288 sf of commercial/ office/retail	Is an affordable housing expediting project. Involves a CPA, Rezone, PDP, and VTM, which have been approved.
15) Paseo	Mixed-Use	
16) San Diego Master Plan	Education	
17) Quarry Falls 230-ac project site located in Mission Valley, north of Friars Road, south of Phyllis Place, west of I-805, and east of Mission Center Road (Project No. 49068; SCH No. 2005081018)	Mixed-Use, including 4,780 du 1.2 million sf commercial 31.8 acres of public parks and an optional school site	Project involves a CPA/GPA, a Specific Plan, Rezone, Master PDP, SDP, VTM, CUP/Reclamation Plan Amendment, and PFFP Amendment. A Draft EIR was completed November 2007 that identified mitigation measures for air quality (construction emissions), biological resources (direct loss of sensitive habitat), historical resources (to unknown, subsurface resources), paleontological resources, traffic/circulation, noise, health and safety, and utilities (solid waste).
18) Garver-Bradley Located immediately to the north of the proposed project in the Navajo Community Plan area and Grantville Redevelopment Project area.	Multi-family Residential	Project has not been submitted. EIR to be prepared.

**TABLE 7-1**  
**LIST OF PROJECTS IN VICINITY USED TO EVALUATE CUMULATIVE EFFECTS**  
**(continued)**

Project Name/Location	Type/Description	Status/Environmental Review
19) RiverPark Located approximately 1.5 miles northeast of the proposed project, north of Mission Gorge Road, across from Princess View Drive.	Mixed-use, Residential, Commercial, Office	Initial project application made. EIR to be prepared

### **Plans Considered for Cumulative Effects Analysis**

This cumulative analysis relies on regional planning documents and associated CEQA documents to serve as an additional basis for the analysis of the broader, regional cumulative effects of the proposed project, such as air quality and global warming. The regional planning documents used in this analysis include: the San Diego APCD RAQS, SANDAG's RCP; the San Diego General Plan Update and Strategic Framework Element; San Diego River Park Master Plan, and the MSCP. These plans are discussed in the Environmental Setting, Section 2.6, and/or the Environmental Impact Analysis, Section 4.0, of this EIR, and are incorporated by reference in the appropriate sections of the cumulative analysis below.

## **7.1 Land Use**

As a general rule, and as stated in the City's Significance Determination Thresholds for land use, projects that are consistent and compatible with surrounding land uses and the applicable community plan should not result in land use impacts. As presented in Section 4.1 of this EIR, the Archstone – Mission Gorge project proposes multi-family residential development and a commercial/recreational leasing facility on an already developed site identified in the Navajo Community Plan for medium-high density multi-family residential use. The proposed project is therefore consistent with the underlying community plan land use designation, but requires the removal of a temporary Mobile Home Park Overlay Zone from the site.

Past projects have contributed, and planned/future projects would contribute, to localized and regional effects on air quality, global warming, biological and cultural resources, traffic, and solid waste disposal, as a result of land uses. The proposed project's direct contribution to these cumulative effects are evaluated in Section 4.0 of this EIR, and would be the same as those identified in Section 4.7, Biological Resources; Section 4.5, Cultural/Historic Resources; Section 4.2, Traffic/Circulation; and Section 4.4, Utilities (solid waste). In short, the potential construction and occupancy effects on adjacent biological habitat (a regionally

declining resource), potential loss of subsurface cultural resources (another regionally declining resource), effects of project ADT on localized traffic circulation, and demands for solid waste disposal (a regionally-impacted utility), would be significant; both in terms of the proposed project's direct effects, and in consideration of all past, existing, and planned future projects.

As discussed in the relevant issue sections below, all existing and planned projects would be required to implement similar mitigation to that proposed for the Archstone – Mission Gorge project. All direct and indirect significant impacts identified for the proposed project would be avoided or reduced to a level below significance through implementation of the mitigation measures identified in this EIR. It can be reasonably assumed, given standardized City significance thresholds and policy requirements, that planned and future projects would implement similar mitigation, thus avoiding or reducing cumulative project impacts associated with land use to below a level of significance.

## 7.2 Traffic/Circulation/Parking

As discussed in Chapter 4.2, Traffic/Circulation/Parking, the traffic report prepared for the project includes an analysis of the near-term (year 2010) and horizon (2030) impacts. The traffic discussion for Section 4.2 of the EIR is summarized from the Traffic Impact Analysis for the Archstone - Mission Gorge Project prepared by Rick Engineering. The cumulative impacts of this site on traffic and circulation would be significant with respect to intersection, roadway, and arterial operation levels. Considering the potential for development in the area, substantial improvements would be required to reduce the cumulative impact of this and other area projects. Thus, cumulative traffic impacts would be significant and unmitigated.

## 7.3 Air Quality

While air quality in the SDAB has generally improved over recent decades, due to auto emissions and other emissions restrictions and improved technologies, the SDAB is currently in non-attainment for federal and state ozone standards, state  $PM_{10}$  and  $PM_{2.5}$  standard and is unclassifiable for the federal  $PM_{10}$  standard. Past development has contributed to this condition, and future development forecasted for the region would generate increased pollutant emission levels from transportation and stationary sources. Because the air basin is non-attainment for ozone,  $PM_{2.5}$ , and  $PM_{10}$ , potential increase in emissions of these toxic air contaminants (TACs) resulting from development of past, current, and foreseeable future projects would potentially pose cumulatively considerable and significant air quality effects.

Cumulative assessment of air quality impacts to the SDAB relies on assessment of project consistency with the adopted RAQS and SIP. The RAQS and SIP are based on growth forecasts for the region, which are in turn based on maximum buildout of land uses as allowed in the adopted community and general plans. Potential cumulative air quality impacts would thus be reduced through achievement of emission levels and reduction strategies identified in the RAQs. With regard to ozone precursors ROG<sub>s</sub> and NO<sub>x</sub>, in general, if a project is consistent with the community and general plan land use designations and intensity, it has been accounted for in the ozone and other TAC attainment demonstrations contained within the SIP, and would not cause a cumulatively significant impact on ambient air quality. Because the Archstone – Mission Gorge project is proposing a development intensity that is currently allowed under the adopted community plan for the project site, the proposed project is considered to be consistent with the SIP and RAQs.

In analyzing cumulative impacts from a proposed project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SDAB is in non-attainment. A project that has significant impacts on air quality due to emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, and ozone (O<sub>3</sub>) or ozone precursors (NO<sub>x</sub> and/or ROG<sub>s</sub> and CO), would have a significant cumulative effect. As identified in Section 4.3, the construction of the proposed project would result in significant emissions of ROG<sub>s</sub>, due to the VOC content of the coatings used during the architectural coatings phase of the construction, unless the number of units coated/painted each day is limited to 12 or less as stated in the air quality mitigation measure (refer to Section 4.3). Emissions due to future daily operation of the proposed project would be less than significant and the proposed project would not expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates. Implementation of the air quality mitigation measure in Section 4.3.4.3 for project construction activities would reduce short-term ROG emissions (and the project-level incremental contribution to cumulative air quality impacts) to below a level of significance.

Because of the localized nature of particulate impacts, and because all of the past, present, and reasonably foreseeable projects would not be undergoing construction at the same time as the project, PM<sub>10</sub> impacts associated with construction of projects in the area would not be cumulatively significant.

Using the ADT projections and intersection parameters identified in the Traffic Impact Study, a CO hot-spot evaluation determined that no significant CO hot spot impacts would result from traffic associated with cumulative projects. (The Traffic Impact Study included cumulative projects in its calculation of long-term/Horizon year ADT.) The planned or reasonably foreseeable projects in the project vicinity have thus been included in Section 4.2's air quality analysis of potential impacts to the ambient air quality based on traffic, which determined that cumulative CO impacts would not be significant.

## **7.4 Utilities**

### **7.4.1 Water Supply/Systems**

Cumulative impacts on regional water demand are potentially significant due to the region's reliance on imported water and because of future uncertainties regarding the reliability of imported water supplies and infrastructure. The proposed project plus cumulative development in the region would incrementally increase regional water consumption, and for some projects (not the proposed project), beyond that which has been planned by the City Water Department and the MWD. Projects which meet the threshold, would be required to submit a Water Supply Assessment in accordance with SB 221 and 610 which would verify that water supply is available to meet project demands. The proposed project was not required to prepare a WSA as it did not surpass the threshold number of proposed dwelling units and initial water calculations showed that water usage currently is approximately 57,000 gallons per day, while post-project water use would be approximately 173,000 gallons per day. This change in water demand would not be unservable by existing/planned water supply. The proposed project would also not require the construction or expansion of new public water systems to serve the project resulting in environmental effects.

Cumulative projects would either be required to submit a WSA or preliminary calculations verifying that water supply would be available to meet individual project demands, and would also be required to document, through a water study or similar evaluation, that existing public water infrastructure is adequate to serve proposed project needs. Cumulative water supply and systems impacts would thus be mitigated to below significance.

### **7.4.2 Sewer Systems**

When added to other past, existing, and future planned development, the implementation of the proposed project would contribute incrementally to impacts to sewer systems serving the region. Additional sewer transmission and treatment facilities may be necessary to accommodate the increased flows from proposed developments. This cumulative impact would be potentially significant. However, as part of project mitigation, future development proposals would be required to construct or contribute towards the cost of constructing required regional wastewater facilities. The provision of regional facilities in conjunction with project-specific improvements would reduce the cumulative impacts to sewer to below a level of significance.

### **7.4.3 Solid Waste**

The proposed project would generate solid waste through construction and ongoing operation, and in conjunction with past, present, and future projects, would increase the amount of solid waste generated within the region. Waste generated from the project area

would most likely be disposed of at the Miramar Landfill, or potentially the Otay and Sycamore landfills. All landfills within the San Diego region are approaching capacity and due to close within the next 3 to 20 years. In response to the 1989 Integrated Waste Management Act, all proposed projects within the city of San Diego would be required to prepare a Waste Management Plan to achieve 50 percent waste reduction and recycling and use of both construction waste and waste generated from long-term project occupancy. Future development would also be subject to the 2007 City Recycling Ordinance which requires the provision of on-site recycling services and educational materials.

Through implementation of a WMP, adherence to the 50 percent reduction mandate, and to the City's Municipal Code including the 2007 City Recycling Ordinance, cumulative projects' solid waste impacts would be anticipated to be reduced to below a level of significance.

#### **7.4.4 Energy**

Development of the proposed project would accommodate additional residents on the site thereby generating additional demand for electricity and natural gas. Together with other cumulative projects, there is a potential for significant impacts to energy supplies. As described in Section 4.4.6, the proposed project incorporates several sustainable site design elements in order to ensure that the project does not result in the consumption of excessive amounts of energy. As such, the project's contribution to energy demands would not be cumulatively considerable. In addition, other cumulative projects would also be required to comply with the mandated Title 24 Energy Efficiency Standards and the policies set forth in the General Plan to reduce energy consumption.

Sustainable design that would be incorporated into the project to reduce the project's overall demand for energy are identified in the Project Description Section 3.4.1 and include the provision of pre-wiring for photovoltaic systems (solar energy panels) on the roofs of all common area structures such as the spa, pool, and recreation facility, as well as on the roof deck of the parking structure (in carport/canopy-type structures). As discussed in the Sustainability subsection of the Project Description, Section 3.6.2 of this EIR, while the proposed project is not seeking LEED certification, it nonetheless meets several of the siting and design prerequisites and credits awarded under the LEED ND rating system to reduce energy consumption. For example, buildings would be designed to reduce energy demand through design measures that meet or exceed California's Title 24 Energy Efficiency requirements. Greater energy efficiency would also be achieved through design that serves to reduce the project's heat island effect (thus reducing demand for air cooling); including the provision of a combination of shade canopies, shade trees, light reflective paving materials, and open grid pavement system for much of the non-roof impervious portions of the project site (roads, sidewalks, upper deck of parking structure, parking lots). Other features of the project may additionally serve to reduce vehicle miles traveled (VMT) and associated fuel consumption. The project site location, within an already urbanized area adjacent to existing and planned public transit service, offers opportunity for transit use and

reduced VMT. The provision of bicycle parking and storage on-site also encourages lesser reliance on automobile use. Pedestrian walkways have also been incorporated into the project design to provide connections between on-site and off-site uses. A multi-use (pedestrian/bicycle) paved trail would be provided along the west perimeter of the project site that would link to a planned regional trail system, allowing pedestrians and cyclists the ability to travel efficiently between Mission Trails Park and Mission Bay/Ocean Beach, an approximate 12-mile stretch. These measures would reduce energy impacts to below a level of significant.

## 7.5 Cultural/Historical Resources

As addressed in Section 4.5 of this EIR, the project site does not contain any known cultural resources but lies within an area rich in cultural resources. Several important cultural/historical sites have been recorded in the project vicinity, largely west of the project site along the San Diego River. Construction of the proposed project has the potential to impact unknown subsurface cultural resources, and implementation measures have been set forth in Section 4.5 that would reduce potential impacts to archaeological resources to below a level of significance. Other projects which involve grading would be conditioned in a similar manner to implement measures that would mitigate potential impacts to regionally declining archeological resources. Implementation of required mitigation measures would reduce the potential cumulative loss of important archaeological resources to below a level of significance. Mitigation, required by each of the past, present, and reasonably foreseeable projects, would reduce cumulative impacts to below a level of significance.

## 7.6 Noise

In the project vicinity, cumulative noise impacts would generally be attributed to increases in traffic volumes. The noise analysis conducted for this EIR used cumulative traffic volumes identified for area roads in the Traffic Impact Analysis. As such, the project noise analysis provides a cumulative analysis as well.

As presented in this EIR's Section 4.6, Noise, the project has the potential to contribute traffic to and require improvements to the intersection of Mission Gorge Road and Greenbrier Avenue. Resulting noise levels under Horizon Year (cumulative) conditions would be potentially significant for sensitive receptors (i.e., residential) uses along Mission Gorge Road. Presently, and as modeled for future conditions, exterior noise levels adjacent to Mission Gorge Road, a six-lane arterial, exceed 70 and 75 dB(A) along its right-of-way. Several buildings within the eastern portion of the project site would be exposed to cumulative noise levels in excess of 60 CNEL, which would potentially result in interior noise levels in excess of the 45 dB(A) CNEL threshold.

Other projects in the vicinity would have the similar potential for significant interior noise impacts due to exterior sources (traffic on major roads) provided they proposed sensitive receptors adjacent to the major roadways. With the implementation of noise mitigation measures similar to those set forth in this project EIR in Section 4.6.5.3, which requires the preparation of an interior acoustical analysis and inclusion of appropriate ventilation/air-conditioning systems for habitable rooms with closed-windows, significant cumulative noise impacts resulting from the approval of the proposed project and projects in the vicinity would be mitigated to a level that is less than significant.

## 7.7 Biological Resources

The proposed project would result in potential adjacency impacts to sensitive habitat, a regionally declining biological resource. Through the implementation of several regional habitat conservation plans, the preservation of the region's biological resources has been addressed. The City of San Diego manages its regional biological resources preservation through the adopted MSCP Subarea Plan. The MSCP was designed to compensate for the regional loss of biological resources throughout the region.

As discussed in Chapter 4.7, Biological Resources, indirect impacts to biological resources in the adjacent MHPA, associated with long-term occupancy of the proposed project, would be mitigated to below a level of significance through adherence to the MHPA Land Use Adjacency Guidelines contained in the MSCP Subarea Plan, as outlined in this EIR's Section 4.7.6.3 mitigation measure. Projects that conform with the MSCP, the City's MSCP Subarea Plan, and implementing ordinances (i.e., ESL Ordinance, Biology Guidelines, and Biological Mitigation Ordinance) would generally not be considered to result in a significant cumulative impact for those biological resources (sensitive species and habitat) adequately covered by the MSCP. Other projects within the city that impact sensitive biological resources would be required to adhere to these same requirements as the proposed project, and cumulative biological impacts would thus not be considered to be cumulatively significant.

## 7.8 Water Quality

Development of the Archstone – Mission Gorge project would involve preparation of a SWPPP and WQTR that set forth construction and permanent, postconstruction BMPs to minimize water quality impacts both during the construction and operation phase of the project. Future projects would also be required to implement these mandated water quality protection measures, and through adherence to the City's NPDES permit, SUSMP, and Stormwater Standards Manual, would prepare project-specific storm water pollution prevention plans and implement practices that would preclude significant water quality

impacts. Implementation of these requirements would avoid potentially significant cumulative impacts.

## **7.9 Hydrology**

As discussed in Section 4.9 of this EIR, Hydrology, the project would not substantially or adversely impact existing drainage patterns, increase runoff, or create flood hazards on-site or downstream. In addition, the proposed project would place fill within the 100-year floodplain of the San Diego River to raise the elevation out of the floodplain. The standard engineering practices and BMPs of the project have been designed to preclude potential hydrology impacts, including those resulting from drainage into the San Diego River. The project would therefore not contribute to any cumulative hydrologic effects in the project area due to cumulative project development. Other projects would be similarly mandated to adhere to state and local engineering requirements and regulations on runoff, drainage, and water quality.

## **7.10 Visual Effects and Neighborhood Character**

Implementation of the proposed project would result in a change in the visual character of the existing site, but the change would not be considered adverse or incompatible with surrounding uses, as discussed in Section 4.10 of this EIR. The proposed project reflects the general trend of new development occurring or planned in the community, which is largely to redevelop underused parcels into medium-high density, mixed residential-commercial uses. The proposed project is consistent with these development trends, including its proposed bulk and scale, which would be generally larger and denser than existing uses. Current one- and two-story structures are planned to be replaced with three- and four-story structures along the east side of Mission Gorge Road, with implementation of the proposed project, the Graver-Bradley project to the north, and the RiverPark project further to the north. While redevelopment in the project area would result in an intensification on a cumulative basis, impacts would not be adverse.

## **7.11 Population and Housing**

As presented in Section 4.11 of this EIR, the proposed project would not result in substantial population growth, nor displace substantial numbers of people necessitating the construction of housing elsewhere, nor fail to comply with the City's Affordable Housing Ordinance. Instead, the proposed project would provide needed housing to accommodate current demand and set aside 20 percent for low- and moderate-income households on-site. The proposed increase in housing supply would implement the housing goals of SANDAG's RCP and Regional Housing Element, and the City's Strategic Framework Element and Housing

Element, not only in terms of quantity, but also in terms of diversity/affordability and location of residentially uses (within already develop areas). Thus, the project would contribute to the creation of housing opportunities within the city by accommodating projected increases in the City's population and demand for affordable housing. Because the proposed project provides densities consistent with the upper range of the existing land use designation of the underlying adopted community plan, it would be considered to be consistent with the community/general plan and SANDAG's growth forecasts which are based upon current land use plans.

Other projects in the vicinity would also generally conform to existing/adopted land use plans as indicated in Table 7-1. Population and housing increases resulting from cumulative projects development would thus represent more of an accommodation of projected population growth and housing demand, versus an unexpected or substantial increase in population growth. Also, similar to the proposed project, which would displace existing on-site mobile home park tenants but provide relocation opportunities and on-site housing at three times the existing quantity, other new projects in the vicinity typically proposed an intensification in land use which would provide additional on-site housing and employment opportunities to meet projected needs. Other projects in the area would also be required to comply with the mandated Inclusionary Housing Ordinance which requires that at least 10 percent of new dwelling units be set aside for affordable housing. Cumulative impacts to population and housing would thus not be significant.

## 7.12 Geology and Soils

The major geologic hazards associated with the project site and future development in the immediately surrounding area (within the San Diego River 500-year floodplain) are related to compressible soils and liquefactions hazards. The proposed project, as would all other projects in the vicinity, would follow standard construction practices and engineering codes to ensure no geologic impacts would result from project development. The proposed project includes additional measures beyond the standard California Building Code and City grading requirements, as identified in the project's geotechnical report, in order to reduce potential liquefaction hazards to below a level of significance.

Potential impacts to future development would be similarly reduced to below a level of significance through implementation of remedial measures identified in project geotechnical investigations, which are required by the City's Grading Regulation for all new development within the city. In addition, conformance to building construction standards for seismic safety with the Uniform Building Code (UBC) would assure that new structures would be able to withstand anticipated seismic events within the city. Therefore, implementation of the proposed project and associated future development in the subregion would not contribute to cumulative impacts related to geology and soils.

## **7.13 Public Services**

Implementation of the proposed project would result in an incremental increase in demand for public services including fire, police, schools, parks, and libraries. This demand, together with other cumulative development may result in a need for new or modified facilities. This cumulative impact is potentially significant. However, there are mechanisms in place as part of the Navajo PFFP and citywide programs to mitigate these impacts to below a level of significant through payment of DIF and school fees to ensure that future development contributes its fair share toward needed facilities.

## **7.14 Public Health and Safety**

Based on the Phase I ESA prepared for the project, there are no known contamination sources on- or off-site. Due to the need for demolition, there is a potential for exposure to asbestos and/or lead-based paint during construction. Applicable federal, state, and local regulations shall be adhered to during demolition for this and any other projects. Therefore, implementation of these requirements would avoid potentially significant cumulative impacts.

## **7.15 Global Warming/Greenhouse Gases**

Global warming is, by definition, a cumulative effects issue. A detailed analysis of potential global warming effects is thus presented in this section, as opposed to Section 4.0, and includes the determination of baseline conditions and impacts for the proposed project, project vicinity, and larger, global context.

### **7.15.1 Existing Conditions**

The earth's climate is in a state of constant flux with periodic warming and cooling cycles. Extreme periods of cooling are termed "ice ages," which may then be followed by extended periods of warmth. For most of the earth's geologic history, these periods of warming and cooling have been the result of many complicated, interacting natural factors that include volcanic eruptions which spew gases and particles (dust) into the atmosphere, the amount of water, vegetation, and ice covering the earth's surface, subtle changes in the earth's orbit, and the amount of energy released by the sun (sun cycles). However, since the beginning of the Industrial Revolution around 1750, the average temperature of the earth has been increasing at a rate that is faster than can be explained by natural climate cycles alone.

With the Industrial Revolution came an increase in the combustion of carbon-based fuels such as wood, coal, oil, and "biofuels." Industrial processes have also created emissions of substances that are not found in nature. This in turn has led to a marked increase in the emissions of gases that have been shown to influence the world's climate. These gases,

termed "greenhouse gases" (GHG), influence the amount of heat that is trapped in the earth's atmosphere. Because recently observed increased concentrations of greenhouse gases in the atmosphere are related to increased emissions resulting from human activity, the current cycle of "global warming" is generally believed to be largely due to human activity. Of late, the issue of "global warming" has arguably become the most important and widely debated environmental issue in the United States and the world.

There are numerous GHGs, both naturally occurring and artificial. Table 7-2 summarizes some of the most common.

**TABLE 7-2**  
**GLOBAL WARMING POTENTIALS (GWP) AND ATMOSPHERIC LIFETIMES (YEARS) USED**  
**IN THE INVENTORY**

Gas	Atmospheric Lifetime	20-year GWP	100-year GWP <sup>a</sup>	500-year GWP
Carbon Dioxide (CO <sub>2</sub> )	50-200	1	1	1
Methane (CH <sub>4</sub> ) <sup>b</sup>	12±3	56	21	6.5
Nitrous oxide (N <sub>2</sub> O)	120	280	310	170
HFC-23	264	9,100	11,700	9,800
HFC-125	32.6	4,600	2,800	920
HFC-134a	14.6	3,400	1,300	420
HFC-143a	48.3	5,000	3,800	1,400
HFC-152a	1.5	460	140	42
HFC-227ea	36.5	4,300	2,900	950
HFC-236fa	209	5,100	6,300	4,700
HFC-4310mee	17.1	3,000	1,300	400
CF <sub>4</sub>	50,000	4,400	6,500	10,000
C <sub>2</sub> F <sub>6</sub>	10,000	6,200	9,200	14,000
C <sub>4</sub> F <sub>10</sub>	2,600	4,800	7,000	10,100
C <sub>6</sub> F <sub>14</sub>	3,200	5,000	7,400	10,700
SF <sub>6</sub>	3,200	16,300	23,900	34,900

SOURCE: USEPA 2002.

<sup>a</sup>GWPs used here are calculated over 100-year time horizon.

<sup>b</sup>The methane GWP includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO<sub>2</sub> is not included.

Of the gases listed in Table 7-2, carbon dioxide, methane, and nitrous oxide are produced by both natural and anthropogenic (human) sources. The remaining gases (hydrofluorocarbons [HFCs; such as HFC-23], perfluorocarbons [PFCs; such as CF<sub>4</sub>], and sulfur hexafluoride [SF<sub>6</sub>]) are the result of human processes.

The potential of a gas to trap heat and warm the atmosphere is measured by its "global warming potential" or GWP. Specifically, GWP:

is defined as the cumulative radioactive forcing – both direct and indirect effects – integrated over a period of time from the emission of a unit mass of gas relative to some reference gas (U.S. EPA 2002).

Greenhouse gases breakdown or are absorbed over time. Thus, the potential of a gas to contribute to global warming is limited by the time it is in the atmosphere, its "atmospheric lifetime." To account for these effects, GWPs are calculated over a specific period of time, such as 20, 100, or 500 years. The parties to the United Nations Framework Convention on Climate Change (UNFCCC) agreed to use consistent GWPs based upon a 100-year time horizon (USEPA 2002). Because of its relative abundance in the atmosphere and its relatively long atmospheric lifetime, carbon dioxide has been designated the reference gas for comparing GWPs. Thus, the 100-year GWP of CO<sub>2</sub> is equal to 1 (see Table 7-2).

### 7.15.2 Implications of Climate Change

The increase in the earth's temperature is expected to have wide ranging effects on the environment. Although global climate change is anticipated to affect all areas of the globe, there are numerous implications of direct importance to California. Statewide average temperatures are anticipated to increase by between 3 and 10.5 degrees Fahrenheit (° F) by 2100. Some climate models indicate that this warming may be greater in the summer than in the winter. This could result in widespread adverse impacts to ecosystem health, agricultural production, water use and supply, and energy demand. Increased temperatures could reduce the Sierra Nevada snowpack and put additional strain on the region's water supply. In addition, increased temperatures would be conducive to the formation of air pollutants resulting in poor air quality.

It is also important to note that even if greenhouse gas emissions were to be eliminated or dramatically reduced, it is projected that the effect of those emissions would continue to affect global climate for centuries.

### 7.15.3 Regulatory Plans and Policies

#### 7.15.3.1 International

Because global climate change is a global concern, much work has been conducted by the international community to address the issue of climate change.

##### a. Montreal Protocol

The Coordinating Committee on the Ozone Layer was established by the United Nations Environment Program (UNEP) in 1977, and UNEP's Governing Council adopted the World Plan of Action on the Ozone Layer. Continuing efforts led to the signing in 1985 of the Vienna Convention on the Protection of the Ozone Layer. This led to the creation of the Montreal Protocol on Substances That Deplete the Ozone Layer (Montreal Protocol), an international treaty designed to protect the stratospheric ozone layer by phasing out production of ozone depleting substances (ODSs). The treaty was adopted on September 16, 1987 and went into force on January 1, 1989.

By the end of 2006, the 191 parties to the treaty had phased out over 95 percent of ozone depleting substances (UNEP 2007). Because of this success, scientists are now predicting that the ozone hole will “heal” later this century.

The elimination of these ODSs also has benefits relative to global climate change because most of these substances are also potent greenhouse gases. For example, chlorofluorocarbon (CFCs) have global warming potential (GWPs) ranging from 4,680 to 10,720 (UNEP 2007). However, as noted, the phasing out of OSDs has led to an increase in the use of non-ozone depleting substances such as HFCs which, although not detrimental to the ozone layer, are also potent greenhouse gases.

### **b. United Nations Framework Convention on Climate Change (UNFCCC)**

Similar to the events that led to the Montreal Protocol, to address growing concern about global climate change, many nations joined an international treaty known as the United Nations Framework Convention on Climate Change. The UNFCCC (the “Convention”) recognizes that the global climate is a shared resource that can be affected by industrial and other emissions of greenhouses gases, and that set an overall framework for intergovernmental efforts to tackle the challenges posed by global climate change. As with the Montreal Protocol, this treaty has been ratified by 191 countries including the United States. Under this treaty, governments (UNFCCC 2007a):

- Gather and share information on greenhouse gas emissions, national policies and best practices;
- Launch national strategies for addressing greenhouse gas emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and
- Cooperate in preparing for adaptation to the impacts of climate change.

The Convention entered into force on March 21, 1994. However, this treaty generally lacked powerful, legally binding measures. This led to the development of the Kyoto Protocol.

### **c. Kyoto Protocol**

The Kyoto Protocol was adopted in December 1997 (UNFCCC 2007b). While the 1997 Kyoto Protocol shares the UNFCCC's objective, principles, and institutions, it significantly strengthens the Convention by committing industrialized countries to individual, legally binding targets to limit or reduce their greenhouse gas emissions. Only parties to the Convention that have also become Parties to the Protocol are bound by the Protocol's commitments. Parties become Parties to the Protocol by either ratifying, accepting, approving, or acceding to it.

### **7.15.3.2 Federal**

The U.S. developed the Climate Change Action Plan (CCAP). The CCAP consists of initiatives that involve all economic sectors and aim at reducing all significant greenhouse gases. The CCAP, backed by federal funding, cultivates cooperative partnerships between the government and the private sector to establish flexible and cost-effective ways to reduce greenhouse gas emissions within each sector. The CCAP encourages investments in new technologies, but also relies on previous actions and programs focused on saving energy and reducing emissions.

### **7.15.3.3 State**

The State of California has passed a number of policies and regulations that are either directly or indirectly related to greenhouse gas emissions.

#### **a. California Code of Regulations, Title 24, Part 6**

California Code of Regulations, Title 24, Part 6 is the California Energy Code. This code, originally enacted in 1978 in response to legislative mandates, establishes energy efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Code is updated periodically to incorporate and consider new energy efficiency technologies and methodologies as they become available. The most recent amendments to the Code are dated September 11, 2006. By reducing California's energy consumptions, emissions of greenhouse gases may also be reduced.

#### **b. Executive Order D-16-00**

This executive order signed by Governor Gray Davis on August 2, 2000, established a state sustainable building goal. The sustainable building goal is "to site, design, deconstruct, construct, renovate, operate, and maintain state buildings that are models of energy, water, and materials efficiency; while providing healthy, productive and comfortable indoor environments and long-term benefits to Californians." As with the California Energy Code, reductions in energy usage provided by sustainable building design would result in reduced greenhouse gas emissions.

#### **c. Senate Bill 1771**

SB 1771 (Sher) enacted on September 30, 2000 requires the Secretary of the Resources Agency to establish a nonprofit public benefit corporation, to be known as the "California Climate Action Registry," for the purpose of administering a voluntary GHG emissions registry. The Energy Commission is required to develop metrics for use by the Registry and to update the State's inventory of GHG emissions by January 1, 2002, and every five years thereafter.

#### **d. Executive Order S-7-04**

This Executive Order (EO) signed by Governor Schwarzenegger on April 20, 2004, designated California's 21 interstate freeways as the "California Hydrogen Highway Network" and directed the California Environmental Protection Agency (CalEPA) and all other relevant state agencies to:

... plan and build a network of hydrogen fueling stations along these roadways and in the urban centers that they connect, so that by 2010, every Californian will have access to hydrogen fuel, with a significant and increasing percentage produced from clean, renewable, sources.

The executive order also directs the CalEPA, in concert with the State Legislature, and in consultation with the State Energy Resources Conservation and Development Commission (commonly called the California Energy Commission [CEC]) and other relevant state and local agencies to develop California Hydrogen Economy Blueprint Plan "for the rapid transition to a hydrogen economy in California" by January 1, 2005. The plan is to then be updated biannually. Recommendations to the Governor and State Legislature are to include, among others:

Promoting environmental benefits (including global climate change) and economic development opportunities resulting from increased utilization of hydrogen for stationary and mobile applications; policy strategies to ensure hydrogen generation results in the lowest possible emissions of greenhouse gases and other air pollutants.

#### **e. Executive Order S-3-05**

This executive order signed by Governor Schwarzenegger on June 1, 2005, established the following greenhouse gas emission reduction targets for the state of California: by 2010, reduce GHG emissions to 2000 levels; by 2020 reduce GHG emissions to 1990 levels; by 2050 reduce GHG emissions to 80 percent below 1990 levels. This executive order also directs the secretary of the California Environmental Protection Agency to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets and on the impacts to California related to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. With regard to impacts, the report shall also prepare and report on mitigation and adaptation plans to combat the impacts.

#### **f. Assembly Bill 32 (AB 32)**

In response to Executive Order S-3-05, the California legislature passed AB 32 (Nuñez), the "California Global Warming Solutions Act of 2006," which was signed by the governor on

September 27, 2006. It requires the CARB to adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020.

**g. Senate Bill 1368 (SB 1368)**

SB 1368 (Parata), passed by the legislature and signed by the governor on September 29, 2006, requires the CEC to set emission standards for those entities providing electricity in the state. The bill further requires that the California Public Utilities Commission (CPUC) prohibit electricity providers and corporations from entering into long-term contracts if those providers and corporations do not meet the CEC's standards.

**h. Senate Bill 1505 (SB 1505)**

Largely in response to Executive Order S-7-04, SB 1505 (Lowenthal), passed by the legislature and signed by the governor on September 30, 2006, requires the CARB to adopt regulations by July 1, 2008 that ensure the production and use of hydrogen for transportation purposes contributes to the reduction of green house gas emissions, criteria air pollutants, and toxic air contaminants.

**i. Executive Order S-01-07**

This executive order signed by Governor Schwarzenegger on January 18, 2007, directs that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. It orders that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California and directs the CARB to determine if a LCFS can be adopted as a discrete early action measure pursuant to AB 32. [The CARB approved the LCFS as a discrete early action item with a regulation to be adopted and implemented by 2010 at its June 2007 hearing.] EO S-01-07 also instructs the California Environmental Protection Agency to coordinate activities between the University of California, the California Energy Commission, and other state agencies to develop and propose a draft compliance schedule to meet the 2020 target.

**7.15.3.4 Local**

**a. City of San Diego Climate Protection Action Plan and San Diego Sustainable Community Program**

In July 2005 the City of San Diego developed its Climate Protection Action Plan to institutionalize policies and actions related to reducing the City's greenhouse gas emissions. As indicated in the plan, on January 29, 2002, the San Diego City Council unanimously approved the San Diego Sustainable Community Program (SCP). Included in the SCP are:

1. The City's GHG Emission Reduction Program, which sets a reduction target of 15 percent by 2010, using 1990 as a baseline.

2. Establishment of a scientific *Ad Hoc* Advisory Committee to expand the GHG Emission Reduction Action Plan for the City organization and broaden the scope to community actions.
3. Membership in the International Council for Local Environmental Initiatives (ICLEI) Cities for Climate Protection (CCP) Campaign to reduce GHG emissions.
4. Charter membership in the California Climate Action Registry.

The Action Plan also provides the GHG emissions data and the reductions needed by 2010 to achieve the state 15 percent reduction goal. The plan presents numerous strategies and actions to be taken by the City to meet the emissions reduction goals.

### 7.15.4 Significance Criteria

There are currently no published thresholds or recommended methodologies for determining the significance of a project's potential contribution to global climate change in documents prepared pursuant to the National Environmental Policy Act (NEPA) or the California Environmental Quality Act (CEQA). Therefore, no uniform accepted approach has been developed for assessing a project's potential impacts relative to global climate change. However, in response to the passage of AB 32 (discussed above) the CARB has developed recommendations for discrete early action measures for reducing greenhouse gas emissions to be implemented prior to, and in concert with, the CARB's release of the State's comprehensive strategy for achieving the greenhouse gas emission reductions mandated by AB 32 (State of California 2007a).

A review of the greenhouse gas emission reduction measures listed in Table 2 of the State's Early Action report indicates that the minimum greenhouse gas emission reduction anticipated by implementing a single measure (e.g., electrification of stationary agricultural engines) is 100,000 metric tons CO<sub>2</sub> equivalent per year (State of California 2007a). Further, the California Attorney General recently provided comments on the Draft Environmental Impact Report (DEIR) for the Coyote Valley Specific Plan in which it is stated that (State of California 2007b):

... by any objective standard, 500,000 metric tons per year would appear to be a considerable contribution. By comparison, many of the "early action measures" for reducing greenhouse gases identified by the California Air Resources Board are in the range of, or substantially less than, 500,000 metric tons.

Therefore, for the purposes of this analysis, a significant impact to global climate change would occur if the project were to result in greenhouse gas emissions of 100,000 metric tons CO<sub>2</sub> equivalent per year, consistent with the minimum greenhouse gas emission reductions anticipated by implementation of one of the CARB's early action measures.

### 7.15.5 Issue 1: Global Warming

Would the proposed project be subject to or create significant adverse effects related to global warming?

#### 7.15.5.1 Impact Analysis

An assessment was made to estimate the total greenhouse gas emissions that would be emitted as a result of operation of the proposed project. Emission estimates were made for the three primary sources of greenhouse gas emissions associated with the development: vehicular traffic on area roadways, emissions from the generation of electricity used by the proposed uses, and natural gas consumption/combustion associated with the proposed uses.

The three primary greenhouse gases that would be emitted by the project are CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. As discussed above, these greenhouse gases have varying amounts of GWP. As shown in Table 7-3, the 100-year GWP potential for CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O are 1, 21, and 310, respectively. Greenhouse gas emission factors are summarized in Table 7-3.

**TABLE 7-3  
GHG EMISSION FACTORS**

Gas	Vehicle Emission Factors (pounds/gallon) <sup>1</sup>	Electricity Generation Emission Factors (pounds/MWh) <sup>2</sup>	Natural Gas Combustion Emission Factors (pound/million ft <sup>3</sup> ) <sup>3</sup>
Carbon Dioxide	19.564	1,340	120,000
Methane	0.00055	0.0111	2.3
Nitrous Oxide	0.0002	0.0192	2.2

<sup>1</sup>SOURCE: BAAQMD 2006.

<sup>2</sup>SOURCE: DOE 2002.

<sup>3</sup>SOURCE: EPA 1998.

#### a. Vehicle Emissions

Vehicle emissions were estimated using the emission factors developed by the Bay Area Air Quality Management District and the estimated VMT per day estimated by the URBEMIS 2007 computer program for the proposed project. The proposed project would generate 2,670 ADT and approximately 26,967 VMT. The EPA estimates that the average fuel economy for passenger cars is 23.9 miles per gallon (mpg) and the average fuel economy for light trucks is 17.4 mpg (U.S. EPA 2005). The proposed project is residential and the vehicle population would likely consist of passenger cars and light trucks. To be conservative, a fuel economy of 17.4 mpg was used to calculate vehicle emissions. It should also be noted that fuel economy is likely to improve in future years.

## b. Electricity

Due to the nature of the electrical grid, it is not possible to say with certainty exactly where this power will be generated. Therefore, greenhouse gas emissions resulting from electricity generation associated with the proposed project were estimated using national average emission factors developed by the U.S. Department of Energy (DOE; 2002) and existing electricity consumption rates. In 2006, the average electricity consumption for a residential consumer was 7,080 kWh (kilowatt hours) per year (DOE 2006). The 444-unit project would consume 3,143,520 kWh (3,143.52 megawatt hours [MWh]) per year. Table 7-3 shows the greenhouse gas emission factors used for estimating emissions due to electricity generation.

## c. Natural Gas

Greenhouse gas emissions resulting from natural gas combustion were estimated using the emission factors developed by the EPA (U.S. EPA 1998) and existing natural gas consumption rates. In 2006, the average natural gas consumption rate for a residential consumer was 67,847 cubic feet per year (DOE 2007). The proposed project would consume 30,124,068 cubic feet per year. Table 7-3 provides the emission factors for greenhouse gas emissions resulting from natural gas combustion.

## d. Total Greenhouse Gas Emissions

Table 7-4 shows the projected greenhouse gas emissions, expressed as equivalent CO<sub>2</sub> emissions, resulting from the proposed project.

**TABLE 7-4  
GREENHOUSE GAS EMISSIONS  
(metric tons/year)**

Emission Source	CO <sub>2</sub>	N <sub>2</sub> O	CH <sub>4</sub>	Total CO <sub>2</sub> Eq <sup>1</sup>
Electricity Usage Emissions	1,911.68	0.03	0.02	1,919.49
Natural Gas Usage Emissions	1,639.68	0.03	0.03	1,649.66
Vehicular Emissions	13.75	0.00	0.00	13.81
Total <sup>1</sup>	3,564.10	0.06	0.05	-
Global Warming Potential	1	310	21	-
Total CO <sub>2</sub> Eq <sup>1</sup>	3,564.10	17.85	1.00	3,582.95

<sup>1</sup> Equivalent - Totals may vary from the sum of the sources due to independent rounding.

As shown, the proposed project is projected to emit 3,582.95 metric tons of CO<sub>2</sub> Eq per year. This is significantly less than 100,000 metric tons per year. GHG emissions due to the proposed project would be less than significant.

Although the project's direct contribution to GHG emissions would be less than significant, global warming, by its nature is a cumulative impact. As described below, the proposed project would include a number of features that would result in a reduction of the emission of greenhouse gases (and thus a reduction in the project's effect on global temperature). With

application of these measures, the project's contribution to global warming would not be considered to be significant.

### **e. Project Features That Reduce GHG Emission**

Because the production of electricity in conventional power plants consumes fossil fuels and therefore results in the release of CO<sub>2</sub> and other GHGs, a reduction in electricity consumption translates to a reduction in net GHG emission. Sustainable design would be incorporated into the project to reduce the project's overall demand for energy. This includes, as identified in the Project Description Section 3.4.1, the provision of pre-wiring for photovoltaic systems (solar energy panels) on the roofs of all common area structures such as the spa, pool and recreation facility, as well as on the roof deck of the parking structure (in carport/canopy-type structures). As discussed in the Sustainability subsection of the Project Description, Section 3.6.2 of this EIR, while the proposed project is not seeking LEED certification, it nonetheless meets several of the siting and design prerequisites and credits awarded under the LEED ND rating system to reduce energy consumption. For example, buildings would be designed to reduce energy demand through design measures that meet or exceed California's Title 24 Energy Efficiency requirements. Greater energy efficiency would also be achieved through design that serves to reduce the project's heat island effect (thus reducing demand for air cooling); including the provision of a combination of shade canopies, shade trees, light reflective paving materials, and open grid pavement system for much of the non-roof impervious portions of the project site (roads, sidewalks, upper deck of parking structure, parking lots).

Other features of the project may additionally serve to reduce VMT and associated fuel consumption and GHG emission. The project site location, within an already urbanized area adjacent to existing and planned public transit service, offers opportunity for transit use and reduced VMT. The provision of bicycle parking and storage on-site also encourages lesser reliance on automobile use. Pedestrian walkways have also been incorporated into the project design to provide connections between on-site and off-site uses. A multi-use (pedestrian/bicycle) paved trail would be provided along the west perimeter of the project site that would link to a planned regional trail system, allowing pedestrians and cyclists the ability to travel efficiently between Mission Trails Park and Mission Bay/Ocean Beach, an approximate 12-mile stretch.

### **f. Consequences of Global Warming**

The anticipated consequences of Global Climate Change have the potential to result in adverse impacts to the proposed project. Statewide average temperatures are anticipated to increase by between 3 and 10.5°F by the year 2100. This could result in widespread adverse impacts to ecosystem health, agricultural production, water use and supply, and energy demand. Increased temperatures could reduce the Sierra Nevada snowpack and put additional strain on the region's water supply. In addition, increased temperatures would be conducive to the formation of air pollutants resulting in poor air quality.

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Future inhabitants of the proposed project could be exposed to increased risk of dehydration, heat stroke, heat exhaustion, heart attack, stroke, and respiratory disease. However, these risks would be no different from those experienced by the San Diego region as a whole. Increased temperatures would result in more frequent use of air conditioning that would increase energy costs to residents and that could put a strain on the area's energy supplies. Because the proposed project is located inland well above sea level, no impacts related to sea level rise are anticipated.

## **8.0 Effects Found Not to be Significant**

Pursuant to CEQA Guidelines Section 15128, this section briefly describes the environmental issue areas that were determined during preliminary project review not to be significant and were therefore not discussed in detail in the EIR.

### **8.1 Agricultural Resources**

The project site is currently occupied by a mobile home park and zoned for residential use under the existing RM-3-7 zone and Navajo Community Plan. The project site has not historically supported agricultural operations and does not contain prime agricultural soils or farmlands as designated by the California Department of Conservation. The project site is not subject to, nor near, a Williamson Act contract parcel. Site development would therefore have no effect on agricultural resources.

### **8.2 Mineral Resources**

The proposed project would not result in the loss of availability of valuable known mineral resources or mineral recovery sites. The project site is not located within a Mineral Resource Zone indicating the presence of significant mineral deposits. Site development would therefore have no effect on mineral resources.

### **8.3 Paleontological Resources**

The geotechnical study of the proposed project site documented that the project site is underlain by undocumented fill soil (Qudf); alluvium (Qal); and terrace deposits (Qt) (see Figure 4.12-1, Section 4.12). These geologic units are assigned a low sensitivity rating for paleontological resource potential in the paleontological monitoring determination matrix in the City's Significance Determination Thresholds for paleontological resources (January 2007). Because all of the on-site geologic units are assigned a low sensitivity rating, there would be no significant impacts to paleontological resources due to project implementation.

## 9.0 Project Alternatives

In order to fully evaluate the environmental effects of proposed projects, CEQA mandates that alternatives to the proposed project be analyzed. Section 15126.6 of the State CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

As discussed in Chapter 4, the proposed Archstone – Mission Gorge project could result in significant, direct, and/or cumulative environmental impacts related to air quality, biological resources, cultural resources, geology and soils, noise, traffic/circulation/parking, and utilities (solid waste). Mitigation measures have been identified which would reduce all direct impacts to below a level of significance. Cumulative impacts associated with traffic would remain significant and unmitigated. In developing the alternatives to be addressed in this chapter, consideration was given regarding their ability to meet the basic objectives of the project and eliminate or substantially reduce significant environmental impacts. As identified in Chapter 3, project objectives include the following:

- Provide residential development that is in accord with the overall objectives of the adopted Navajo Community Plan land use designation of Multi-family Residential and underlying Base Zone of RM-3-7, without the temporary mobile home park overlay.
- Provide affordable multi-family residential housing that exceeds the goals and objectives of the City of San Diego’s Inclusionary Affordable Housing Regulations by providing on-site units.
- Help the City of San Diego address its shortage of housing for workers in the economically diverse industries of Mission Gorge and Mission Valley.
- Provide a project design that reflects the positive qualities of the adjacent San Diego River and associated Multi-Habitat Planning Area in a multi-family development.
- Implement smart growth principles through the provision of high-density residential units in an already urbanized location adjacent to existing public transportation, employment, and other public infrastructure and services, and through development of a centralized community with on-site recreational amenities and links to off-site regional natural areas.
- Implement reasonable sustainable building practices.

## 9.0 Project Alternatives

- Integrate land use and design with the Grantville Redevelopment Project Area plans, through provision of pedestrian, bicycle and vehicular connectivity, and through provision of compatible land use and architectural and landscape design.

The alternatives identified in this section are intended to further reduce or avoid significant environmental effects of the proposed project. The EIR addresses the No Project Alternative and Reduced Project Alternative. Each major issue area included in the impact analysis of this EIR has been given consideration in the alternatives analysis.

As required under Section 15126.6 (e) (2) of the CEQA Guidelines, the EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project. Section 9.4 addresses the Environmentally Superior Alternative.

## 9.1 Alternative Considered but Rejected

### 9.1.1 Alternative Land Use

As an extension of the commercial corridor along Mission Gorge Road, the project site could be developed with a commercial or industrial use. While commercial or industrial development would be similar to nearby uses, this alternative was rejected for the following reasons.

- Commercial/industrial use would not be consistent with either the land use designation on the site (Multi-Family Residential, medium-high density) or zoning (RM-3-7).
- *Commercial/industrial development would not be compatible with existing residential uses in the immediate project vicinity or planned uses within the Grantville Redevelopment Project area.*
- Commercial/industrial development would not address the housing shortage and would not increase the supply of affordable housing.

### 9.1.2 Alternative Project Locations

According to the CEQA Guidelines (Section 15126.6 (f) (2) (A):

The key question and first step in (alternative location) analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

The project site was selected for residential development as it is consistent with the vision of the General Plan and Strategic Framework element to implement smart growth principles through the provision of high-density residential units in an already urbanized location adjacent to existing public transportation, employment, and other public infrastructure and services, and through development of a centralized community with on-site recreational amenities and links to off-site regional natural areas. The proposed project which entails development of medium high density residential use (444 units) on an infill site meets these criteria.

In order to accomplish the objectives of the proposed project, it would be necessary to identify an alternative infill site of comparable size (approximately 10 acres) in proximity to Mission Gorge or Mission Valley which is appropriately designated and zoned for medium high density residential use and close to transit. While there may be other sites that meet these criteria, they are not in the applicant's ownership.

For example, there may be other areas within the Grantville Redevelopment Area which could be combined to provide approximately 10 acres. However, currently there are no areas within Grantville that are designated for medium high density residential development. Therefore, development would require a Community Plan Amendment and Rezone. Additionally, impacts would be virtually identical to those associated with the proposed project. Traffic generated by an infill project in Grantville would have generally the same impacts on circulation. Air quality, noise, and solid waste impacts would also be generally the same. Depending on location, impacts to the San Diego River and biological and cultural resources could be greater.

While there are currently undeveloped infill sites in the Mission Valley community, those sites have approvals in place or currently seeking approvals and are much greater in size than 10 acres. The Quarry Falls project is proposed for the approximate 230.5-acre Vulcan mining site. The Levi-Cushman Specific Plan area, located in the western portion of Mission Valley, is not owned by the same property owner as Archstone - Mission Gorge and has been approved for mixed-use development. It can develop in the future under the adopted Specific Plan. The Qualcomm Stadium site is owned by the City of San Diego and encompasses approximately 166 acres. The Mission Valley Community Plan includes the potential redevelopment of that site to include a community park. The Mission Valley Community Plan does not show the Qualcomm site for development with multiple uses; however, the Strategic Framework Element does identify the Qualcomm Stadium as a potential site for an Urban Village. The Qualcomm site is not owned by the same property owner as Archstone - Mission Gorge.

As indicated above, only locations that would avoid or substantially lessen any of the significant effects of the proposed project need be addressed. Since impacts at an alternative location would be generally the same as the proposed project, selection of an alternative site would not avoid or substantially lessen the project's impacts. Given the objective of the project to provide affordable and workforce housing in an urbanized area,

alternative sites have the potential to result in greater environmental impacts than the proposed project. Therefore, because existing or planned developments have already been considered for alternative sites and the alternative sites are owned by others, the alternative locations would not be available for the Archstone - Mission Gorge project. For these reasons, alternative project locations were not considered further. Additionally, while the proposed project would be in accord with the density recommended in the Navajo Community Plan and the existing underlying zone, alternative sites may require a plan amendment or rezone.

### 9.1.3 Project Access Alternative

Alternative access to the project site was considered in order to lessen impacts on Mission Gorge Road. This alternative would provide right-turn only access at Greenbrier Avenue with right turns in/out of the project driveway without a median break along Mission Gorge Road at Greenbrier Avenue. The traffic along the northbound Greenbrier Avenue and southbound Project Access approaches would be controlled by a stop sign. The east-west traffic on Mission Gorge Road would be uncontrolled.

As examined in the traffic report (see Appendix D), the unsignalized intersection of Mission Gorge Road/Greenbrier Avenue/Project Access in the horizon (2030) conditions both without and with Tierrasanta Boulevard and Santo Road extensions, would be expected to operate unacceptably at LOS F (AM peak) and LOS E (PM peak) with an average delay of approximately 50 seconds per vehicle for the vehicles attempting to turn right onto westbound Mission Gorge Road approach from the project driveway.

This considerable amount of delay for the project vehicles may result in unsafe operations at the intersection of Mission Gorge Road/Greenbrier Avenue/Main Project Access under this alternative. This alternative would also result in an inconvenience for the project vehicles with respect to access (out of direction travel). For example, the eastbound destined project vehicles would need to use the signalized intersection of Mission Gorge Road/Zion Avenue (2,200 feet away from Mission Gorge Road/Greenbrier Avenue) to make U-turns and to head east on Mission Gorge Road, which may result in increased delays at the intersection of Mission Gorge Road/Zion Avenue. Similarly, the inbound project vehicles traveling from the west need to make U-turns at the signalized intersection of Mission Gorge Road/Old Cliffs Road to access the project site.

There are currently vehicles making U-turns at the signalized intersection of Mission Gorge Road/Old Cliffs Road. The proposed project would add approximately 160 vehicles to this U-turn movement during the PM peak hour. It is important to note that the U-turns generally utilize considerably higher green time than left turns (almost twice as much) at a signalized intersection. Consequently, 160 eastbound U-turns from the project at Mission Gorge Road/Old Cliffs Road would be approximately equivalent to 300 left turns, which would significantly deteriorate the signal operations at this intersection.

Old Cliffs Road would be providing access to two major developments that are in the planning process: Superior Ready Mix Multi-Use development (395 acres) and Garver - Bradley residential development (23 acres). These projects are located north of Mission Gorge Road just east of Old Cliffs Road. Old Cliffs Road is expected to be one of the access roads for Superior Ready Mix project, which would add approximately 1,600 ADT to Old Cliffs Road. Additionally, Old Cliffs Road is expected to be the primary access road for Garver - Bradley residential project, which would add approximately 6,900 ADT to Old Cliffs Road. During the peak hours, these projects are expected to add a total of 500 vehicles to the southbound Old Cliffs Road approach at the intersection of Mission Gorge Road/Old Cliffs Road, resulting in LOS F with excessive delays.

In conclusion, the project access alternative with right-turn in/right-turn out only access at Greenbrier Avenue would significantly deteriorate the traffic operations at the signalized intersection of Mission Gorge Road/Old Cliffs Road. The level of service at this intersection under these future conditions would be expected to be LOS F with right turn in/right turn out only access at Greenbrier Avenue. Therefore, the right-turn in/right-turn only access alternative at Greenbrier Avenue would be a less preferred alternative compared to the full access alternative with a signal at Greenbrier Avenue. Additionally, the signalized system comprising of the new proposed signal at Greenbrier Avenue and the existing signal at Old Cliffs would operate better with less delay and impact to the existing signalized intersection at Old Cliffs Road. It is for these reasons that this alternative was deemed undesirable and was therefore rejected.

## 9.2 No Project Alternative

The following discussion of the No Project Alternative is based on the CEQA Guidelines Section 15126.6 (e) (3) (B) which states:

If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the no project alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this no project consequence should be discussed. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve existing physical environment.

Further, according to Section 15126.6(e)(3)(C):

After defining the no project alternative . . . , the lead agency should proceed to analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Based on this approach, the no project alternative for the proposed Archstone – Mission Gorge project would be two-tiered: (1) maintenance of the site as a mobile home park and (2) future redevelopment of the site with a maximum of 444 multi-family units consistent with underlying land use designation in the Navajo Community Plan (Multi-Family Residential, medium-high density) and underlying zone (RM-3-7). Maintenance of the site as a mobile home site would be equivalent to the existing environmental setting. In this case, however, preservation of the site as a mobile home park cannot be assured, thus, it is reasonable to assume that there may be a future proposal to develop the site consistent with the community plan and zoning.

As discussed below, this alternative would fall short of a number of the project's objectives. This includes the objective of providing affordable multi-family residential housing. Whereas the proposed project not only meets, but exceeds the goals and objectives of the City of San Diego's Inclusionary Affordable Housing Regulations by providing on-site units, the no project alternative would not assure any affordable multi-family housing. In addition, the objective of addressing the City's shortage of housing for workers in the economically diverse industries of Mission Gorge and Mission Valley would not be met. Finally, the No Project Alternative would not implement the project's objective of applying smart growth principles through the provision of high-density residential units in an already urbanized location adjacent to existing public transportation, employment, and other public infrastructure and services.

A comparative analysis of the impacts associated with this alternative and the proposed project is provided below.

## **9.2.1 Land Use**

### **9.2.1.1 No Project/Retain Mobile Home Park Alternative**

The No Project/Retain Mobile Home Park Alternative would be consistent with the Navajo Community Plan in that it would retain the Mobile Home Park Overlay and would eliminate the need for amending the Navajo Community Plan to remove the Mobile Home Park Overlay.

While this alternative would not conflict with adopted land use plans, policies, or ordinances, it would not implement the City of Villages concept of the General Plan and Strategic Framework Element to the same extent as the proposed project. These programs embrace smart growth principles which aim to preserve remaining open space and natural habitat and focus development within areas with available public infrastructure. The project site is identified in the General Plan as Residential with a moderate propensity for village development which means that it provides an opportunity for development where a variety of housing types can be offered. Overall, the No Project/Retain Mobile Home Park Alternative would limit housing opportunities for a range of income levels compared to the proposed project.

In addition, this alternative would not implement the vision of the Draft San Diego River Park Plan to the same extent as the proposed project as it would not provide linkage to planned trails along the river.

#### **9.2.1.2 No Project/Redevelopment with Multi-Family Residential Alternative**

The No Project/Redevelopment with Multi-Family Residential Alternative would allow for the construction of a maximum of 444 units. As with the proposed project, this alternative would be consistent with adopted land use plans, policies, and ordinances and with existing and planned land use in the project area.

### **9.2.2 Traffic/Circulation/Parking**

#### **9.2.2.1 No Project/Retain Mobile Home Park Alternative**

Existing and projected traffic conditions would remain unchanged with the continuation of the mobile home use. The No Project/Retain Mobile Home Park Alternative would result in an incremental decrease in traffic generation of 1,474 ADT compared to the proposed project. No improvements to the Mission Gorge Road/Greenbrier Avenue intersection would occur under this alternative; thus, eliminating a significant traffic/circulation impact identified for the proposed project due to main access requirements. However, significant impacts at the Friars Road/I-15 southbound ramps would not be avoided. This intersection would operate at an unacceptable level under the existing, near-term and horizon year conditions in the same way as the proposed project.

#### **9.2.2.2 No Project/Redevelopment with Multi-Family Residential Alternative**

Traffic generation and impacts of the No Project/Redevelopment with Multi-Family Residential Alternative would be the same as the proposed project. Mitigation in the form of

improvements to the Mission Gorge Road/Greenbrier Avenue/Main Project Access intersection would be required as with the proposed project.

### **9.2.3 Air Quality**

#### **9.2.3.1 No Project/Retain Mobile Home Park Alternative**

Maintenance of the project site with the existing mobile home park would eliminate short-term emissions associated with grading and construction activities. Long-term emissions would be slightly reduced under this alternative as there would be fewer residents generating traffic; however, neither the proposed project nor the No Project/Retain Mobile Home Park Alternative would result in significant operation-level air quality impacts.

#### **9.2.3.2 No Project/Redevelopment with Multi-Family Residential Alternative**

The No Project/Redevelopment with Multi-Family Residential Alternative would have the same impacts as the proposed project as it would require mitigation for construction-level emissions and would generate the same amount of operation-level impacts.

### **9.2.4 Public Utilities**

#### **9.2.4.1 No Project/Retain Mobile Home Park Alternative**

The No Project/Retain Mobile Home Park Alternative would not affect existing water sewer or energy facilities as services would continue as they are today. This alternative would not generate demolition waste that would require disposal at the landfill. On the other hand, this alternative would not have a Waste Management Plan in place to mitigate impacts to solid waste disposal.

#### **9.2.4.2 No Project/Redevelopment with Multi-Family Residential Alternative**

The No Project/Redevelopment with Multi-Family Residential Alternative would have the same demand for water, sewer, and solid waste services as the proposed project.

### **9.2.5 Cultural/Historical Resources**

#### **9.2.5.1 No Project/Retain Mobile Home Park Alternative**

In the absence of grading for the No Project/Retain Mobile Home Park Alternative, there would be no potential to uncover subsurface cultural resources. Any existing undiscovered

resources would remain buried. Since the proposed project requires mitigation during construction to ensure the recovery of any resources, both would result in the same impact as there would not be any loss of resources.

#### **9.2.5.2 No Project/Redevelopment with Multi-Family Residential Alternative**

As with the proposed project, mitigation would be required during construction of the No Project/Redevelopment with Multi-Family Residential Alternative to avoid the potential loss of subsurface cultural resources.

### **9.2.6 Noise**

#### **9.2.6.1 No Project/Retain Mobile Home Park Alternative**

Under this alternative, retention of the mobile home park would eliminate the potential for construction-related noise. Mobile home tenants would remain exposed to the existing exterior and interior noise levels. Exterior ground-floor noise levels exceed 70 dB(A) along the eastern portion of the project site, adjacent to Mission Gorge Road. Thus, existing interior noise levels and noise levels in exterior useable areas within the eastern portion of the mobile home park likely exceed City noise standards for residential uses.

#### **9.2.6.2 No Project/Redevelopment with Multi-family Residential Alternative**

Like the proposed project, the design of this alternative would need to take into consideration noise constraints from traffic on Mission Gorge Road. Potential impacts may occur unless useable exterior open space is planned in areas with noise levels less than 65 dB(A) CNEL. In addition, units on the eastern portion of the site which are exposed to exterior noise levels greater than 60 dB(A) CNEL would require interior noise mitigation similar to the proposed project.

### **9.2.7 Biological Resources**

#### **9.2.7.1 No Project/Retain Mobile Home Park Alternative**

Since there would be no construction activities with the No Project/Retain Mobile Home Park Alternative, short-term disruption of sensitive wildlife species would not occur. However, unlike the proposed project, the existing mobile home park has not been designed to take into consideration indirect impacts to the adjacent San Diego River habitat. Thus, the potential for impacts to biological resources associated with this alternative would be worse than the proposed project.

### **9.2.7.2 No Project/Redevelopment with Multi-Family Residential Alternative**

Any new development associated with the No Project/Redevelopment with Multi-Family Residential Alternative would be required to be designed such that indirect biological impacts and short-term construction impacts would be avoided as with the proposed project.

## **9.2.8 Water Quality**

### **9.2.8.1 No Project/Retain Mobile Home Park Alternative**

Water quality conditions on the project site would remain unchanged with the No Project/Retain Mobile Home Park Alternative. Studies prepared for the proposed project (Rick Engineering 2008) determined that there are currently no runoff treatment management practices being employed on-site or off-site to treat runoff from the existing mobile home park before being discharged into the San Diego River. Runoff from the mobile home park is likely contaminated with pollutants typical of urban development, including nutrients from fertilizers and eroded soils, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease from leaking vehicles or illegal dumping, bacteria and viruses from pet waste, and pesticides. Thus, this alternative would continue to impact the water quality of the San Diego River.

### **9.2.8.2 No Project/Redevelopment with Multi-Family Residential Alternative**

Implementation of the No Project/Redevelopment with Multi-Family Residential Alternative would require the same construction and post-construction BMPs and compliance with NPDES as the proposed project in order to eliminate the potential for hydrology/water quality impacts.

## **9.2.9 Hydrology**

### **9.2.9.1 No Project/Retain Mobile Home Park Alternative**

Current drainage patterns on the project site would remain with the No Project/Retain Mobile Home Park Alternative and tenants would continue to be placed within the 100-year floodplain. Drainage improvements proposed as part of the project would not be implemented to avoid impacts to the San Diego River.

### **9.2.9.2 No Project/Redevelopment with Multi-Family Residential Alternative**

Implementation of the No Project/Redevelopment with Multi-Family Residential Alternative would require the same construction and postconstruction BMPs and compliance with NPDES as the proposed project in order to eliminate the potential for hydrology/water quality impacts.

## **9.2.10 Visual Effects and Neighborhood Character**

### **9.2.10.1 No Project/Retain Mobile Home Park Alternative**

As an existing use, the mobile home park would not affect the existing neighborhood character. This use would, however, be less consistent with future redevelopment in the adjacent Grantville Redevelopment Area than the proposed project. In addition, this alternative would not provide the opportunities for urban design features such as cohesive architectural style and landscaped courtyards that are included in the proposed project.

### **9.2.10.2 No Project/Redevelopment with Multi-Family Residential Alternative**

The visual/neighborhood character impact of this alternative would be similar to the proposed project. Design of this alternative would dictate the aesthetics; however, this project would have a similar overall bulk and scale as the proposed project.

## **9.2.11 Population and Housing**

### **9.2.11.1 No Project/Retain Mobile Home Park Alternative**

The No Project/Retain Mobile Home Park Alternative would retain the existing 119-space mobile home park. This alternative would provide housing opportunities for fewer people than the proposed 444-unit project. As the mobile home park would be retained, however, existing tenants would not be required to relocate. Mobile homes are considered to be an affordable housing option, so loss of these spaces would reduce available affordable housing stock.

While this alternative would avoid the displacement of existing tenants and loss of affordable housing stock, the proposed project would reduce these impacts by providing relocation assistance to all eligible residents of the existing mobile home park and setting aside 20 percent of the total units (~~approximately 90 units~~) for low and moderate income households which would exceed the requirements of the City's Affordable Housing Ordinance. Thus, the proposed project would result in meeting the goals of more housing and more affordable units.

### **9.2.11.2 No Project/Redevelopment with Multi-Family Residential Alternative**

Implementation of the No Project/Redevelopment with Multi-Family Residential alternative would result in the same impacts as the proposed project by resulting in displacement of existing residents and loss of affordable housing stock. Mitigation in the form of relocation assistance would be required. In addition, this alternative would be subject to compliance with the City's Affordable Housing Ordinance necessitating the provision of 10 percent of the total proposed units for low and moderate income households, either on-site, off-site, or through in-lieu-of fees. This affordable housing requirement is less than the affordable housing program being proposed by the project applicant.

## **9.2.12 Geology/Soils**

### **9.2.12.1 No Project/Retain Mobile Home Park Alternative**

Geologic conditions at the project site would remain unchanged with the No Project/Retain Mobile Home Park Alternative. According to the geotechnical investigation the site is subject to liquefaction at the lower elevations of the project site. Liquefaction hazards may occur within the alluvial deposits at depths of 10 to 30 feet below the ground surface. Under this alternative, corrective actions would not be taken and could increase exposure of people or property to risks.

### **9.2.12.2 No Project/Redevelopment with Multi-Family Residential Alternative**

The No Project/Redevelopment with Multi-Family Residential Alternative would result in the same exposure of people or property to hazards associated with geologic and soils conditions as the proposed project. Construction of this alternative would require the same mitigation measures as the proposed project to avoid liquefaction risks.

## **9.2.13 Public Services**

### **9.2.13.1 No Project/Retain Mobile Home Park Alternative**

The demand on public services would remain unchanged from the existing condition with the No Project/Retain Mobile Home Park Alternative. There would be no additional demand for police, fire, school, park, or library. On the other hand, there would be no payment of Development Impact Fees or school fees for communitywide services and facilities.

### **9.2.13.2 No Project/Redevelopment with Multi-family Residential Alternative**

The No Project/Redevelopment with Multi-family Residential Alternative would have the same demand on public services and provide the development fees similar to the proposed project.

## **9.2.14 Public Health and Safety**

### **9.2.14.1 No Project/Retain Mobile Home Park Alternative**

Since the mobile home park would remain intact with this alternative, the potential for asbestos and lead paint would remain whereas these materials would be removed under controlled circumstances with the proposed project.

### **9.2.14.2 No Project/Redevelopment with Multi-Family Residential Alternative**

Similar to the proposed project, any asbestos and lead paint would be removed in a controlled manner to avoid significant impacts.

## **9.3 Reduced Project Alternative**

This alternative would reduce the number of units to a level that would avoid significant unmitigated impacts associated with the proposed project. Based on the traffic report (see Appendix D), such a Reduced Project Alternative would entail 200 multi-family units. As this Reduced Project Alternative would result in a density of 19.5 du/acre, it would be below the density range associated with the land use designation and zoning.

The lower yield in residential units would necessitate a different design for the project and the lower number of units would not support the cost of constructing a parking garage. Therefore, the Reduced Project Alternative would be designed as a “garden” product, with two- and three-story residential units constructed in several buildings over the entire site. A conceptual design of this Reduced Project Alternative is shown on Figure 9-1. Building heights would be within the limits established by the existing RM-3-7 Zone (a maximum of 45 feet). Parking would be provided as “tuck-under” garages beneath units and in open surface parking lots with approximately 353 parking stalls; a parking ratio of 1.77 stalls per unit. Resident amenities would be similar to the proposed project, providing a pool and other outdoor areas. Construction of the retaining wall along the western property line would still be required to raise development out of the floodplain. However, the wall could be placed inside the property line and a deviation for wall height would not be required. Deviations for side-yard reduction would be required for this alternative, similar to the proposed project. In

## 9.0 Project Alternatives

addition, since this alternative would need to be raised out of the floodplain, the height deviation would still be requested since dimensioning remains to be measured from existing grade.

While the proposed project would exceed the City's Inclusionary Housing Ordinance by providing a minimum of 20 percent affordable units on site, the Reduced Project Alternative would be unable to accommodate these affordable units on-site. This alternative would reach compliance with the City's Inclusionary Housing Ordinance by providing 10 percent affordable units off-site or by paying a fee to waive this requirement. At the levels specified, the Reduced Project Alternative would provide 20 affordable units, as compared to the minimum 89 affordable units provided by the proposed project.

As discussed below, this alternative would fall short of a number of the project's objectives including the provision of affordable multi-family residential housing that exceeds the goals and objectives of the City of San Diego's Inclusionary Affordable Housing Regulations by providing on-site units by substantially reducing the number of affordable units provided; assisting the City of San Diego in addressing its shortage of housing for workers in the economically diverse industries of Mission Gorge and Mission Valley; and implementing smart growth principles through the provision of high-density residential units in an already urbanized location adjacent to existing public transportation, employment, and other public infrastructure and services.

*A comparative analysis of the impacts associated with the Reduced Project Alternative and the proposed project is provided below.*

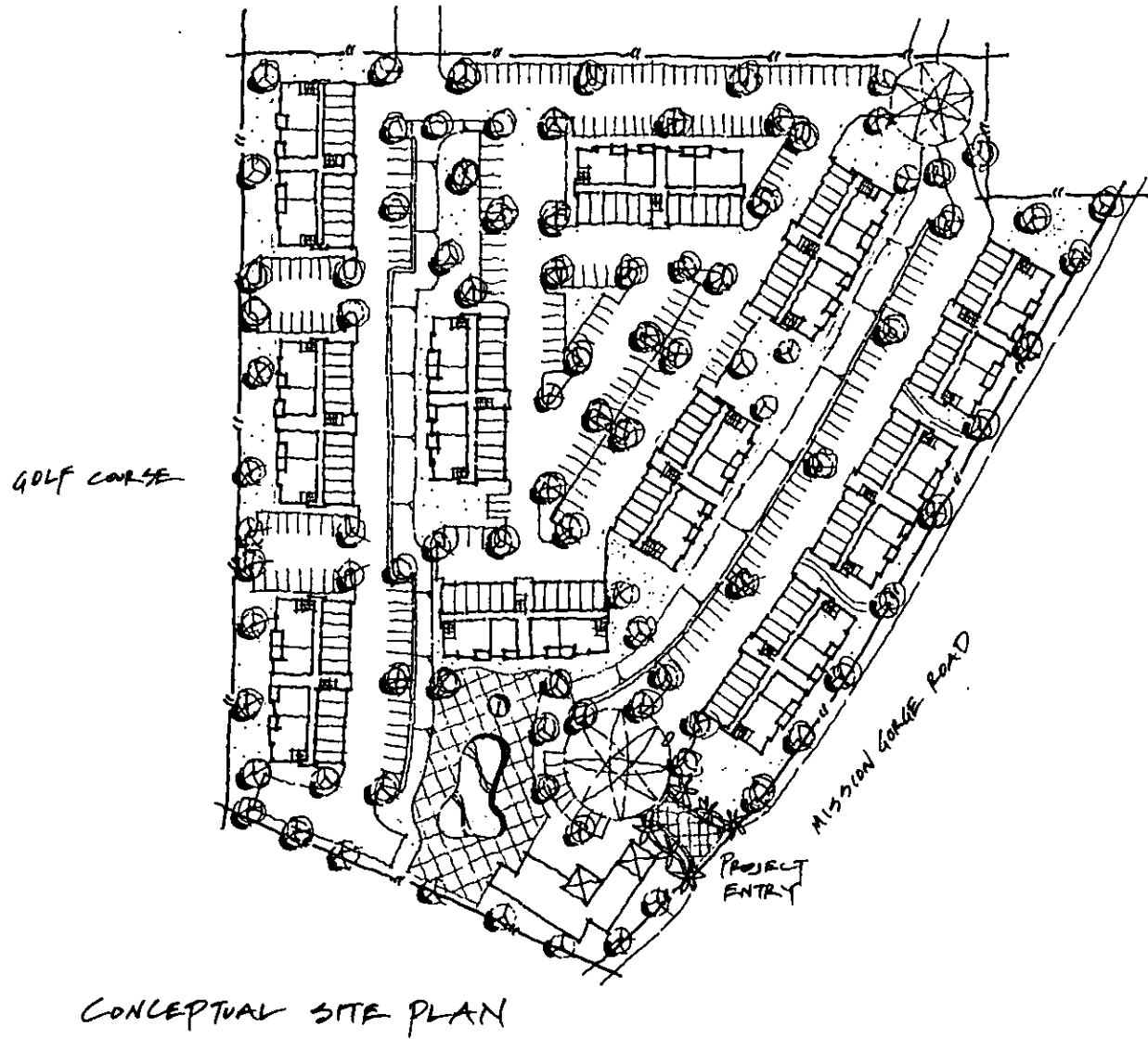
### 9.3.1 Land Use

The Reduced Project Alternative would be consistent with the Multi-Family Residential land use designation in the NCP, but would provide a residential density considerably less than the proposed project (i.e., 19.5 du/acre compared to 44 du/acre), thus not providing the intensity of development envisioned in the General Plan City of Villages strategy. Like the proposed project, this alternative would require a CPA and rezone to remove the Mobile Home Park Overlay. The Reduced Project Alternative would not implement the goals of the Strategic Framework Element, General Plan, or Housing Element to the extent possible since it would not maximize the site's development potential relative to providing additional and affordable housing for the City in an area with available public infrastructure.

### 9.3.2 Traffic/Circulation

The Reduced Project Alternative with 200 units would generate a total ADT of 1,200 vehicles per day. However the net ADT from the reduced project would be only 605 vehicles per day ( $= 1,200 - 595$ ) with the credit for 119 existing mobile homes. According to the traffic report

005009



PROJECT SUMMARY:

1 BR : 100 UNITS

2 BR : 88 UNITS

3 BR : 12 UNITS

TOTAL : 200 UNITS

TOTAL ACRES : 10.22 AC.

DENSITY : 19.5 DU/AC

PARKING PROVIDED : 353 STALLS

PARKING RATIO : 1.77 STALLS/UNIT

0' 50' 100' 200'

FIGURE 9-1  
Reduced Project Alternative Conceptual Site Plan

(see Appendix D), this alternative would have no significant traffic impacts (intersections or roadways) under either the near-term or horizon (2030) conditions, both without and with Tierrasanta Boulevard and Santo Road extensions. Thus, this alternative would eliminate the significant unmitigated impacts of the proposed project.

### **9.3.3 Air Quality**

The Reduced Project Alternative would result in short-term impacts similar to the proposed project since grading and construction activities would be similar. This alternative would result in a reduced level of traffic-related emissions because the reduced number of units (244 fewer) would generate approximately 55 percent less traffic than the proposed project. This reduction would not be substantial in relation to the proposed project as project-related emissions would not be significant.

### **9.3.4 Public Utilities**

This alternative would result in a slight reduction in the demand for water, sewer, solid waste, and energy services. Nevertheless, this would not result in a substantial reduction and the same mitigation would be required for solid waste disposal.

### **9.3.5 Cultural/Historical Resources**

Development of the Reduced Project Alternative would result in the same impacts as the proposed project. No significant resources have been observed on the project site; however, there is a potential for subsurface resources. Therefore, the proposed project, along with the Reduced Project alternative, would require monitoring during construction.

### **9.3.6 Noise**

Noise impacts of the Reduced Project Alternative would be similar to those of the proposed project. Noise levels at useable exterior open space areas would be consistent with City guidelines. Units in the eastern portion of the site would be exposed to interior noise due to traffic on Mission Gorge Road that may exceed the 45 dB(A) CNEL threshold. Thus, mitigation would be required to reduce interior noise levels with this alternative and the proposed project at the buildings which would be exposed to exterior noise levels greater than 60 dB(A) CNEL.

### **9.3.7 Biological Resources**

Due to the lack of sensitive biological resources on the project site, there would be no direct impacts to biological resources under the Reduced Project Alternative, similar to the

proposed project. As with the proposed project, indirect and short-term impacts to adjacent habitat associated with the San Diego River MHPA would require mitigation.

### **9.3.8 Water Quality**

Development of the Reduced Project Alternative would result in the same impacts to water quality as the proposed project since construction and post-construction activities would remain the same. BMPs would be required, similar to the proposed project in order to avoid significant impacts to water quality.

### **9.3.9 Hydrology**

Construction of the Reduced Project Alternative would require similar alteration of the floodplain and drainage improvements to maintain storm water flow velocities to pre-project levels. Like the proposed project, this alternative would avoid significant impacts through the provision of an engineered storm drain system. Unlike the proposed project, this alternative would result in a greater amount of impervious surface area due to the elimination of the parking structure.

### **9.3.10 Visual Effects and Neighborhood Character**

The scale of the residential structures for the Reduced Project Alternative would be more in keeping with existing land uses in the project area as compared to the proposed project which includes a deviation for height. However, given the redevelopment potential within the Grantville Redevelopment Project Area, this difference would become less prominent with future development.

Given that a Reduced Project Alternative would not support the cost of a parking garage, this alternative would necessitate large expanses of surface parking. The open parking areas are generally considered less visually attractive than parking structures because of the amount of land area they take up and lack of integration with buildings and structures. Expansive surface parking would not be consistent with the policies of the Urban Design Element and the Mobility Element of the City's General Plan which state:

Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking. (UD-A.11)

Strive to reduce the amount of land devoted to parking through measures such as parking structures, shared parking, mixed-use developments, and managed public parking . . . , while still providing appropriate levels of parking. (ME-G.2.b)

### **9.3.11 Population and Housing**

Development of the project site under the Reduced Project Alternative would result in the same displacement of mobile home residents as the proposed project. However, it would provide a reduced benefit in terms of the provision of the overall number of housing opportunities and a substantial reduction in the amount of affordable units when compared to the proposed project.

### **9.3.12 Geology and Soils**

Geologic conditions on the project site would pose the same constraints on development of the Reduced Project Alternative as the proposed project. These constraints would be addressed through specific measures and design considerations contained in the Geotechnical Investigation and City ordinances in order to reduce impacts to below a level of significance.

### **9.3.13 Public Services**

The Reduced Project Alternative would support a reduced population, thereby placing less demand on public services, including police, fire, schools, parks, and library. While the demand for public services would be somewhat reduced, there would not be a significant demand for new facilities with either the proposed project or the Reduced Project Alternative.

### **9.3.14 Public Health and Safety**

Construction of this alternative would have the same potential for encountering asbestos and lead paint during demolition as the proposed project. Precautionary measures would be taken; the same as the proposed.

## **9.4 Alternative Evaluation/Environmentally Superior Alternative**

A summary comparison of the proposed project to the alternative considered as described above is shown in Table 9-1. An overall evaluation of the alternatives compared to the proposed project is provided below, along with an identification of the Environmentally Superior Alternative.

### **9.4.1 No Project/Retain Mobile Home Park Alternative**

The No Project/Retain Mobile Home Park Alternative would maintain the status quo in terms of use of the site as a mobile home park and environmental characteristics. The continued

**TABLE 9-1  
MATRIX COMPARISON OF THE PROPOSED ARCHSTONE – MISSION GORGE PROJECT AND ALTERNATIVES**

Environmental Issue Area	Proposed Project	No Project/Retain Mobile Home Park Alternative	No Project/Redevelopment with Multi-family Residential Alternative	Revised Project Design/Reduced Project Alternative
Land Use	Significant impacts mitigated to below level of significance	Same as proposed project. Less consistent with Strategic Framework Element, Draft General Plan Update, Housing Element and Draft San Diego River Plan	Same as proposed project	Same as proposed project. Impacts slightly less
Traffic/Circulation	Significant cumulative roadway segment impacts would not be mitigated to below a level of significance.	Less impacts – no significant direct impacts	Same as proposed project	Less impacts – no significant impacts on traffic/circulation. Greater impacts on parking.
Noise	Significant impacts mitigated to below level of significance	Construction – Less impacts Operation – Same as proposed project	Same as proposed project	Same as proposed project
Biological Resources	Significant impacts mitigated to below level of significance	Greater impacts. Significant impacts not mitigated	Same as proposed project	Same as proposed project
Air Quality	Construction - Significant impacts mitigated to below level of significance Operation – No significant impacts	Construction– Less impacts Operation - Same as proposed project	Same as proposed project	Same as proposed project. Impacts slightly less
Public Services	Significant impacts mitigated to below level of significance	Less impacts	Same as proposed project	Same as proposed project. Impacts slightly less
Public Utilities	Water/sewer – No significant impacts Solid waste - Significant impacts mitigated to below level of significance	Water/sewer - Same as proposed project Solid waste - Less impacts. No direct impacts No benefits of Waste Management Plan	Same as proposed project	Same as proposed project. Impacts slightly less
Geology and Soils	No significant impacts	Impacts not mitigated	Same as proposed project	Same as proposed project
Cultural/Historic Resources	Significant impacts mitigated to below level of significance	Less impacts	Same as proposed project	Same as proposed project
Water Quality	No significant impacts	Greater impacts. Significant impacts not mitigated	Same as proposed project	Same as proposed project
Public Health and Safety	No significant impacts	Same as proposed project	Same as proposed project	Same as proposed project
Visual Effects and Neighborhood Character	No significant impacts	Less impacts	Same as proposed project	Same as proposed project
Population and Housing	No significant impacts	Same as proposed project	Same as proposed project	Same as proposed project
Hydrology	No significant impacts	Greater impacts. Significant impacts not mitigated	Same as proposed project	Same as proposed project

use of the site as a mobile home park would avoid impacts related to displacing existing residents and eliminating one type of housing option. The proposed project would reduce these impacts through the provision of relocation assistance and setting aside 20 percent of the units for low and moderate income residents. While this alternative would avoid displacing tenants, it would restrict the residential potential of the site and would not implement the smart growth principles to the extent of the proposed project. As such, this alternative would not meet many of the objectives of the proposed project.

By retaining the mobile home park, construction-related impacts of the project (air quality, noise, biological resources, hydrology/water quality, and solid waste disposal) would be avoided. However, these construction-related impacts would be mitigated to below significance with the proposed project. Due to the fact that the site was developed for mobile home park use over 50 years ago (in 1959), prior to many recent/current land use development requirements, existing daily operation of the mobile home park results in potential impacts to biological resources, geology/soils, hydrology/water quality, and solid waste disposal that would be avoided through design or mitigation measures incorporated into the proposed project. The No Project/Retain Mobile Home Park Alternative for this project is rather unusual because it would replace an existing use which would continue its own environmental problems, rather than building on vacant land. For these reasons, the No Project/Retain Mobile Home Park Alternative would not be considered the environmentally superior alternative.

### **9.4.2 No Project/Redevelopment with Multi-family Residential Alternative**

Given that the use of the site as a mobile home park is not assured in perpetuity, the No Project/Redevelopment with Multi-family Residential Alternative represents a "no project" (i.e., a scenario where the proposed project is not approved) alternative which could be implemented as it is consistent with the land use designation and underlying zoning of the project site. This alternative would be consistent with the underlying land use designation and RM-3-7 zone with a maximum of 445 units. As with the proposed project, this alternative would require a Community Plan Amendment/Rezone to remove the Mobile Home Park Overlay. This alternative would generally result in the same level of impacts as the proposed project. Like the proposed project, the No Project/Redevelopment with Multi-family Residential Alternative would meet the objectives of the proposed project, but in regard to the objective of providing affordable housing, may meet the objective to a lesser extent. Unlike the proposed project which commits 20 percent of proposed on-site units to be set aside for low/moderate income residents, current regulations require only 10 percent.

### **9.4.3 Reduced Project Alternative**

The Reduced Project Alternative would represent the elimination of the proposed deviations for building and retaining wall height, as well as the elimination of significant roadway

impacts. In order to accomplish this, the number of units would be reduced from 444 to 200, resulting in a density below the multi-family residential land use designation (30-43 du/acre). Overall, this alternative would result in very similar impacts to the proposed project. While the lower building height would be more in keeping with the low profile of existing residences in the project area, the height of the proposed structures under the proposed project as allowed by the deviation request, would be consistent with future redevelopment in the adjacent Grantville Redevelopment project area. Given that there would be approximately a 55 percent reduction in the number of units with this alternative, impacts related to air quality, traffic/circulation, and utilities would be correspondingly reduced. While the extent or character of impacts would be reduced under this alternative, only for traffic impacts would the level of significance be reduced compared to the proposed project. With the exception of these traffic issues, all significant impacts identified for both the proposed project and the Reduced Project Alternative would be mitigated to a level that is not significant. Due to the elimination of the significant unmitigated traffic impact, the Reduced Project Alternative would be considered the environmentally superior alternative. However, considering San Diego's housing crisis and the decrease in affordable housing provided by this alternative, the attractiveness of the Reduced Project Alternative is much reduced.